



CRITICAL Reminders

for Interns, Trainees,
and Supervisors



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Updated October 2014 by
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The information that follows has been compiled to assist interns, trainees, and applicants in navigating the sometimes complicated intricacies of the licensing law and regulations while pursuing licensure. Understanding the law and regulations is critical to acquiring hours of experience and subsequently qualifying for the license as quickly and efficiently as possible. Use this resource as a guide to assure the protection of your hard-earned hours of experience. This information is likewise critical to supervisors to be able to provide the most accurate information and to not lead supervisees astray.

Communicating with the BBS

When communicating with the BBS, especially when submitting forms and applications, it is recommended that you mail “certified, return receipt requested.” Likewise, keep photocopies of all that you submit to the Board and attach the “certified return receipt” to the copy you retain. It is to your advantage to keep accurate records, as you may need these should there be any question about your hours of experience or supervision.

BBS' Current Address:

Board of Behavioral Sciences 1625 North Market Blvd., Suite S-200
Sacramento, CA 95834; Phone: (916) 574-7830; Fax: (916) 574-8625; Website: www.bbs.ca.gov

Requests for Applications and Forms can be printed from the BBS Website, which is likely the most expeditious way to acquire the forms. Requests for BBS forms and applications may also be made in writing to the above address or by telephone. If you request by telephone or in writing, be sure to make your requests for forms early so that you are prepared with forms when you need them. Generally allow at least two weeks for requests by mail or phone to be processed.

Retain Copies of Application Materials

On another note, be sure to keep copies of any applications in perpetuity. One never knows what direction life events will take. Your application may get lost in the mail. You may need the

application many years later when you, because of life events, wish to relocate to another state and need to apply for licensure within the new jurisdiction. Expecting to acquire copies of the forms from the BBS, after many years have passed, may be difficult if not impossible.

Be Truthful on Applications (Even if it Hurts)

Be careful, cautious, and truthful on applications. Do not fail to disclose a past conviction even if you believe it is no longer accessible, or has been expunged. Providing a letter describing what happened, what you have accomplished to assure rehabilitation, and enclosing a copy of any disposition would be worthwhile.

Intern Registration

Allow at least 60 days for processing your application for Intern Registration. Processing may be more rapid, but it could also be delayed, especially if something is inadvertently omitted from the application or not clear in the application. Unreadable fingerprinting may also cause a delay and sometimes resubmissions are necessary, which could significantly delay the processing of applications. In other words, apply as early as possible. If one submits an application for intern registration within 90 days of being granted a degree (regardless of how long it takes to process the application), the hours of experience gained post-degree will count as long as lawfully employed and not employed in a private practice.

The Breeze Online System

The BBS has recently launched its online system. Currently, the Breeze system can be used to verify a license, file a complaint, pay any outstanding fines and pay with a major credit card. In the near

future, the system can be used to renew a license or registration. Eventually, you can use the system to request for duplicate certificate, change of address, certification of license history, rescoring of an examination, retake of the LPCC Grandfather Law and Ethics Exam, retake of the LPCC Grandfather LMFT GAP Exam, and retake of the LPCC Grandfather LCSW GAP Exam. Once the exam restructure is implemented in 2016, the system can be used for LMFT, LCSW, and LPCC exam eligibility applications.

Intern/Post Degree Experience

Applicants who are post-degree who did not apply for intern registration within 90 days of their degrees being granted will not be able to accrue any hours post degree until the intern registration numbers are actually granted. One should anticipate that application processing could take 60 days or in some cases even longer if there are unanswered questions, finger-printing difficulties, or other problems.

First-Time Examination Candidates

The Exam Eligibility application is where you submit all hours of experience for the Board's review to qualify for the license. Currently, LMFT exam applicants should allow a minimum of four to five months for processing.

Written Examinations

Applicants for the LMFT exam must take written examinations that are administered continuously. When you are notified by the BBS of eligibility to take the written examination, you will need to schedule yourself with the entity with whom the Department of Consumer Affairs has contracted to administer the examinations.

Re-Examinees

Candidates who do not pass either the regular written exam or the clinical vignette written exam will need to sign-up to be reexamined. Candidates being re-examined will be required to pay an additional examination fee in a timely manner. Re-examinations are required to be at least 180 days following the candidates' most recent examination date. Re-examinees must wait until the next examination cycle to retake a "failed" examination in order to take a new form of the examination. This "waiting" period also provides ample time to study and further prepare for retaking the examination.

Clinical Vignette Examination First Time Candidates

Candidates are considered eligible for the clinical vignette examination after passing the written examination. Like the regular written examination, candidates schedule themselves to take the exams.

Taking Exams When Offered is Important

Caution—Generally speaking, a person who does not take an examination or re-examination within one year of eligibility of examination will have his/her application abandoned, which will require re-application. If you must re-apply, you may possibly lose hours of experience that may be too old to be countable at the time of re-application.

Recommendation— Take exams whenever they are available to you even if you do not feel 100 percent prepared. There is no limit to the number of times one can take an exam.

Note: Effective January 1, 2016, there will be a new exam process for LMFT applicants, which will consist of a new California law and ethics examination and a new clinical examination. These new exams will replace the standard written and the clinical vignette exams currently in place. Effective January 1, 2016, upon registration with the BBS, an MFT intern must, within the first year of registration, take the new California law and ethics exam. After completion of all the education requirements, completion of supervised work experience, and passage of the California law and ethics exam, the applicant must take the new clinical exam. LMFT applicants who have passed the standard written exam, but have not passed the clinical vignette exam by January 1, 2016 will then need to take the new clinical exam. Applicants who have not passed the standard written exam by January 1, 2016, must take both the new California law and ethics exam and the new clinical exam.

Information for Trainees, Interns, and Applicants

A "trainee" is a person who is in his/her graduate degree program to qualify for the license and has completed 12 semester or 18 quarter units of study.

An "intern" is a person who has been granted his/her degree to qualify for the license, has applied for and been granted his/her intern registration number from the BBS.

A "post-degree applicant" is either a person who has been granted his/her degree and applies for intern registration within 90 days of being granted that degree or has applied for the license and/or is in the process of being examined to qualify for the license.

Guidelines on Hours of Experience

Following are requirements for collecting hours of experience for licensure as an LMFT in the State of California. These requirements are paraphrased from the licensing law and regulations governing the marriage and family therapist profession.

A minimum of 3,000 hours of experience is required. Such experience may be gained in no less than 104 weeks, which spans the period from being a trainee through being a registered intern.

Trainee Experience

Not more than 750 hours of counseling and direct supervisor contact may be obtained prior to the granting of the qualifying degree. (This limitation on hours does not include professional enrichment activities such as workshops and personal psychotherapy received.) "Trainees" are unlicensed persons enrolled in qualifying master's or doctor's degree programs who have completed no less than 12 semester units or 18 quarter units of coursework.

As a trainee, one can gain a maximum of 1,300 hours, including a maximum of 750 hours of counseling and direct supervisor contact. A minimum of 1,700 hours must be gained subsequent to the granting of the master's or doctor's degree.

Trainees are not required to have completed 12 semester or 18 quarter units of study to receive personal psychotherapy for countable hours. These are the only hours that do not require supervision. Keep in mind, however, that such experience will only count if the psychotherapist is a licensed professional, but such licensee needs only a current and valid license and does not need to be two years licensed. These hours will be recorded on the Exam Eligibility application.

Practicum Hours of Experience

Hours of experience gained during the practicum, as required within the educational program, may be counted as hours of experience (i.e., hours of experience gained doing therapy, as opposed to classroom instruction). Further, up to 500 clinical hours of practicum experience is exempt from the "six-year-rule". Even though all practicum hours may be countable as hours of experience, only 500 hours may be older than six years. Additionally, hours of experience gained as a trainee must be coordinated between the school and the site where the hours are being accrued. The school must approve each site and must have a written agreement with each site. Hours gained during practicum, like all other hours of experience, must be accounted for on the BBS Weekly Summary of Hours logs.

Students who enter into a graduate program on or after August 1, 2012 or for students who are currently enrolled in a graduate program that meets the requirements of the "new curriculum," must complete a minimum of 225 hours of experience in supervised practicum, of which 75 hours may be in client-centered advocacy. Further, these students may only counsel clients and gain these hours toward licensure when enrolled in a practicum course, with the exception of a 90 day period, if the 90 day period is immediately preceded and proceeded by enrollment in a practicum course or completion of the degree program.

Maximum Hours Per Week for Interns and Trainees

No more than forty (40) hours of experience may be credited for any seven consecutive days. These 40 hours are inclusive of all categories of experience (e.g., supervision, workshops, client contact hours, etc.).

Minimum Hours for Couples, Families, and Children

Not less than five hundred (500) total hours of experience shall have been gained in diagnosing and treating couples, families, and children. These hours may be in any combination, e.g., all children or a mix of couples, families, and children. The first 150 hours of treating couples and families are double-counted.

Psychological Testing, Process/Progress Notes and Client-Centered Advocacy

Not more than five hundred (500) hours of experience will be credited for administering and evaluating psychological tests of counselees, writing clinical reports, writing progress notes, or writing process notes and client-centered advocacy. These hours are optional.

Group Counseling or Therapy

No more than five hundred (500) hours of experience will be credited for providing group therapy or group counseling. Group counseling hours are optional. When counseling groups of children, you may record the hours under "children."

Telehealth

Not more than three hundred seventy-five (375) hours of experience may be counted toward providing psychotherapy, crisis, or other counseling services via telehealth (telephone and/or Internet therapy). These hours are optional.

Hours of Supervision—Individual and Group

During each week in which experience is claimed and for each work setting in which experience is gained, an applicant shall have at least one (1) hour of direct supervisor contact or two (2) hours of direct supervisor contact in a group of not more than eight (8) persons receiving supervision. The intern/trainee shall have at least two hours of group supervision in every week in which group supervision is claimed. Group supervision is optional. Group supervision may be acceptable when gaining, for example, an hour on Monday and an hour on Wednesday, as long as the hours are both in the same seven day period making up the week. Supervision hours are actual sixty minute hours, not 45 to 50 minute therapy hours. Each hour of group supervision counts as an hour of experience. If less than two hours of group supervision are provided within the week, the supervision hours will not count and one's hours of experience may be jeopardized.

The intern/trainee shall receive at least one (1) hour of individual supervisor contact per week for a minimum of fifty-two (52) weeks. These weeks need not be consecutive. Individual supervision means one supervisor and one person being supervised. In other words, there must be 52 separate weeks within which at least one hour of individual, face-to-face supervision has been provided. Direct supervisor contact means face-to-face supervision, which also includes contact via two-way, real-time video conferencing for interns who work in a non-profit, governmental agency, or educational institution.

Maximum Countable Supervision per Week

Not more than five (5) hours of supervision, whether individual or group, shall be credited during any single week. Keep in mind, however, that it may be necessary to gain and record more than five hours of supervision in a week to be able to credit all hours of experience gained. Effective January 1, 2015, the maximum number of supervision hours an applicant can count toward licensure will be increased to six (6) hours per week. This law will apply to hours gained on or after January 1, 2009.

Ratios for Interns, Trainees, and Applicants

Trainees shall receive an average of at least one unit of direct supervisor contact for every five hours of client contact in each setting. While there must be supervision within each week, these ratios need not be accounted for within each week, they are calculated based upon the average gained over the entire period of time one works in a given work-setting. Interns shall receive at least one unit of direct supervisor contact for the first ten hours of client

FROM MASTERS DEGREE TO LICENSURE			
Trainee		Applicant	Registered Intern
Enter Masters degree program	12 Semester 18 Quarter Units required to collect hours	Must apply for Intern Registration within 90 days to be able to collect hours during this time. Employment in private practice not permitted. ----- Requirements for hours are the same as for Interns.	Maximum of six years as a Registered Intern however may reapply for a new intern number and hours roll forward. Private practice employment not permitted in subsequent six year intern registration periods.
	Complete Masters degree program ----- Degree granted/ confirmed/posted		
	Supervision Ratios 5 to 1 individual or 5 to 2 group	Supervision for first 10 hours of experience one hour individual or two hours group plus one additional individual hour or two additional group supervision hours for hours over 10	
			Application pending or hours approved and in examination process or passed exams and awaiting receipt of license. ----- When application approved, one hour of individual or two hours of group supervision required in each work setting.
			Licensed <i>Congratulations!</i> License granted as a Marriage and Family Therapist.

TRAINEE LIMITATIONS	
	Masters Program (Maximum of 1300 total hours gained as a trainee)
Must complete 12 semester or 18 quarter units of study to collect hours. ----- Exception: hours for personal psychotherapy	750 Hours Maximum client contact and supervision Minimum of six semester or nine quarter units of practicum
Those beginning Graduate Study on or after August 1, 2012 or who are meeting the requirement of the new law must be enrolled in a practicum course to counsel clients	Those beginning Graduate Study prior to August 12, 2012 MINIMUM OF 150 Hours of client contact in practicum Up to 500 of the practicum hours of experience (depending on the number actually gained) are exempt from the "six year rule."
	Those beginning Graduate Study on or after August 1, 2012 or who are meeting the requirement of the new law MINIMUM OF 225 Hours of client contact in practicum although 75 hours may be in client centered advocacy

HOURS OF EXPERIENCE REQUIREMENTS AND LIMITATIONS AT A GLANCE					
		1,000 Hours Maximum		3,000 Hours Total	
250 Hours MAXIMUM	Workshops, seminars, training sessions, and conferences approved by supervisor	300 Hours MAXIMUM	Personal psychotherapy received (100 x 3= 300 hours) do not require supervision	500 Hours MAXIMUM	• Administering and evaluating psych tests, writing clinical reports, writing process or progress notes • Client centered advocacy
	Individual and Group Supervision (no more than five hours per week— effective 1/1/2015, no more than six hours per week)	500 Hours MAXIMUM	• Administering and evaluating psych tests, writing clinical reports, writing process or progress notes • Client centered advocacy	500 Hours MINIMUM	Diagnosing and treating couples, families, and children. (First 150 hours with couples and families may be double-counted.)
		MAXIMUM LIMITED BY 1,000 TOTAL HOURS		500 Hours MAXIMUM	Group counseling or therapy
				375 Hours MAXIMUM	Psychotherapy, crisis counseling, or other counseling by telemedicine (telephone or Internet)
				HOURS REMAINING	May be individual, or couples, families, and children

contact per week and one additional unit for any hours over ten in that same week. One unit equals one individual supervision hour or two group supervision hours.

When the hours have been approved by the BBS (following the application to take the regular written examination), it is no longer necessary to meet the ratios of experience to supervision. However, at least one hour of individual supervision or two hours of group supervision continues to be required for each work setting until licensed.

Supervision/Professional Enrichment Activities

Not more than a combined total of 1,000 hours of experience for related professional enrichment activities will be counted. Such activities include:

- Not more than 250 hours of workshops, training sessions, seminars, and conferences approved by supervisor. Two hundred fifty hours is the maximum while as an intern, a trainee, or both. These hours are optional and do not require direct supervision in the week the intern or trainee attends the workshop, training session, seminar, or conference approved by the supervisor. Furthermore, the BBS accepts workshop, seminar, training and conference hours that are acquired through online courses, provided that the courses meet all other requirements.
- Actual hours of supervision.
- Not more than 300 hours (when 100 hours are triple-counted) of personal psychotherapy received from a California licensed mental health professional. These hours do not require supervision. One may not get psychotherapy from one's supervisor. Psychotherapy hours include group, marital or conjoint, family, or individual psychotherapy received. The two year license requirement applicable to supervisors is not applicable to this experience. These hours are optional. There is no BBS form for these hours. Applicants will log these hours on the Exam Eligibility application. Have the mental health professional provide a letter or statement verifying hours.

Weekly Summary of Hours

Each trainee and intern shall maintain a weekly summary of all hours of experience gained toward licensure. The weekly summary shall be signed by the supervisor on a weekly basis. An applicant shall retain all such logs until such time as the applicant is licensed by the Board. The Board shall have the right to require an applicant to submit all or such portions of the weekly summary as it deems necessary to verify hours of experience. (These logs are generally not required to be submitted to the Board with the Exam Eligibility application unless the Board audits the application or requests the logs be submitted.)

Note: Make sure your supervisor signs the logs each week. These documents provide verification that you actually gained experience during the periods indicated. Additionally, we would recommend that you retain these documents indefinitely. You never know when you might need them.

Experience Verification

Each Trainee and Intern shall submit to the BBS a completed and signed Experience Verification form with his/her exam eligibility application. The supervisor must complete and sign the form. Any changes should be initialed by the supervisor and the Board may verify such changes. A separate form should be used for each supervisor verifying hours of supervised experience and for each employment setting. A separate form should be used for pre-degree and post degree hours.

“Six Year Rule”

All 3,000 hours of experience, with the exception of the practicum hours described above, must have been gained in the six years immediately preceding the date the application for examination is filed. Thus, the maximum amount of time for which hours may be credited, with the exception of up to 500 qualifying practicum hours, is six years (This is affectionately known as the “six-year rule.”). This “six year rule,” provides that all experience shall be gained within the six years immediately preceding the date the application for licensure was filed, except that up to 500 hours of clinical experience gained in the supervised practicum shall be exempt from this six-year requirement. Another way to view the six-year rule is if you want to count the first hour you have gained and that hour is not an hour gained in practicum, you would have to apply for licensure/examination within six years of that first hour. For example, if you applied for licensure on January 1, 2020, all hours except for the 500 protected practicum hours would need to be completed between January 1, 2014 and December 31, 2019.

The Other Six Year Limit—Intern Registration

Persons who do not complete their hours of experience within the initial six-year intern registration period must reapply for a new intern registration. Such persons may not work in private practice. Hours from one intern registration roll into another intern registration period; however, in no case may the hours submitted to qualify for licensure be older than six years, with the exception of up to the 500 exempt hours gained during the practicum.

Note: The six year intern registration and the six year limitation on hours may totally or partially overlap, but they are separate and distinct periods of time that should not be confused. These two six-year periods of time are critical for applicants to understand. If the initial six-year intern registration is exhausted, one must apply for and qualify for a new intern registration number. The hours now carry forward into the next intern registration period (which was, at one time, not the case).

Supervision Reminders

Current Valid License

Make sure your supervisor holds a current, valid license, which is not under suspension or probation by a licensing board. Sometimes licensees neglect to notify the BBS, or other licensing board, of a move—consequently, they may neglect to renew their licenses

in a timely manner. Also, be certain that the supervisor has been California licensed for two years prior to commencing supervision. The following licensed professionals may be supervisors: licensed marriage and family therapists, physicians certified in psychiatry by the American Board of Psychiatry and Neurology, psychologists, licensed clinical social workers, and licensed professional clinical counselors (must complete additional training and education as specified in California Business and Professions Code section 4999.20(3)). Verify on the licensing boards' website that the supervisor's license is current, valid, and not under suspension or probation. Be sure to check again at the time of the supervisor's next renewal to make sure that the license is subsequently renewed. A supervisor's failure to renew his or her license will result in a loss of hours to the supervisee.

Note: The only exception to the two-year license requirement is supervisors who provide supervision only to trainees at an academic institution that offers a qualifying degree program, where the supervisor has been licensed in California and in any other state, for a total of at least two years prior to commencing any supervision.

Supervisor Mandatory Continuing Education

Supervisors, licensed by the Board of Behavioral Sciences who supervise MFT interns and trainees, are required to complete each license renewal period, six (6) hours of continuing education in supervision. This coursework is to be taken either prior to or within sixty days after commencing the supervision of an intern or trainee. However, the supervisor's negligence in failing to take the required coursework will not result in the loss of hours for the intern or trainee.

Note: The six (6) hours of continuing education requirement does not apply to supervisors who are licensed as a physicians certified in psychiatry by the American Board of Psychiatry and Neurology or a psychologist.

Payment for Supervision

According to California Labor Code Section 221, an employer may not require an employee to pay for anything that is of benefit to the employer, which arguably includes supervision. Therefore, it is CAMFT's recommendation that employers not require employed and volunteer interns to pay for supervision.

Offsite Supervision or Supervision Not Paid for By the Employer

It is permissible to get offsite supervision in any work setting other than private practice, but only where an appropriately executed letter of agreement exists. This letter of agreement (the original) must be filed by the applicant with his/her Exam Eligibility application. A Sample "Letter of Agreement For Offsite Supervision" can be found at the end of this article and on the CAMFT website at www.camft.org. This letter of agreement should be typed onto the letterhead of the employer as it is the employer who is permitting the "offsite supervision," or permitting the supervisee to get supervision not provided by the employer.

Who May Not Supervise

Interns and trainees are not to gain any experience under the

supervision of a spouse, relative, or domestic partner. Any experience obtained under the supervision of a supervisor with whom the applicant has had or currently has a personal or business relationship that undermines the authority or effectiveness of the supervisor shall not be credited toward the required hours of supervised experience. Additionally, interns and trainees cannot receive supervision from anyone who has ever been their therapist.

Individual Supervision

Individual supervision means one supervisor and one person being supervised. As regulation specifies, supervision is to be "one-on-one, individual, and face-to-face." One hour of individual supervision means sixty minutes of supervision.

Group Supervision

Group supervision means a group of not more than eight persons being supervised by one supervisor. Again, the supervision, according to regulation, is to be "face-to-face." Two supervisors for a group of sixteen supervisees would not be acceptable. Two hours of group supervision means one hundred twenty minutes of supervision. Each hour of supervision may occur on different days as long as it occurs within the same week in which the hours are being claimed.

Exception to Face-to-Face Supervision

An exception to face-to-face supervision is where an intern is working in a government entity, a school, college, or university, or an institution that is both nonprofit and charitable, and such intern may gain supervision by two-way, real-time videoconferencing.

Other Supervision Guidance

Supervisees may have some weeks where they receive solely individual supervision and some weeks where they receive solely group supervision.

Separate supervision is required for each work setting in which one is gaining hours of experience. For example, intern in setting one gains three hours of experience and is therefore required to have one hour of individual or two hours of group supervision in that setting, and in setting two sees five clients and is also required to have one hour of individual or two hours of group supervision for this setting.

For hours of experience to count within a given week, supervision must occur within the same week that the hours are gained. However, for trainees the ratios are not necessarily required to be achieved within the same week as the hours of experience are gained.

A supervisor may supervise an unlimited number of interns and trainees in any appropriate work setting other than private practice, but is limited to supervising three MFT interns when those interns are employed in private practice. Supervisors are limited to supervising groups of no more than eight persons under supervision.

A supervisor shall give at least one week's written notice to an intern or trainee of the supervisor's intent not to sign for any further hours of experience for such person. A supervisor who has not provided

such notice would be obligated to sign for hours of experience obtained in good faith where such supervisor actually provided the required supervision and the supervisee actually gained experience.

The supervisor is required to have practiced psychotherapy or provided direct supervision for at least two years within the five year period immediately preceding any supervision.

The supervisor is required to address with the intern or trainee the manner in which emergencies will be handled. The supervisor is required to obtain from the supervisee, the name, address, and telephone number of the prior supervisor and employer. The intent is that the supervisor will address with the prior supervisor and employer issues and concerns that will benefit the supervision of the intern or trainee. The supervisor is required to verify that the site is appropriate for gaining hours of experience.

Miscellaneous Reminders

Employment/Volunteer/Independent Contractor

Interns, trainees, and applicants may only perform services as employees (IRS Form W-2) or as volunteers, and not as independent contractors (IRS Form 1099). Interns, trainees, and applicants who have been hired and paid on an independent contractor basis will have their hours denied. The BBS views independent contractor status as self-employment, which is the reason such hours are denied. One may only be self-employed following licensure. If employed, an applicant for the license shall provide the Board with copies of the corresponding W-2 tax forms for each year of experience claimed when applying for the license. If volunteering, an applicant shall provide the BBS with a letter from his or her employers verifying the intern's employment as a volunteer when applying for the license.

Payment for Expenses

Trainees, interns, and applicants who provide volunteered services or other services, and receive no more than a total, from all work settings, of five hundred dollars per month as reimbursement for expenses actually incurred. The Board may audit applicants who receive reimbursement for expenses, and applicants have the burden of demonstrating that the payments received were for reimbursement of expenses actually incurred.

Disclosure

Interns, trainees, and applicants are required to inform clients, prior to performing professional services of their unlicensed status, their registration number, their employer's information, and that they are working under the supervision of licensed marriage and family therapists, licensed clinical social workers, licensed professional clinical counselors, licensed psychologists, or licensed physicians certified in psychiatry by the American Board of Psychiatry and Neurology.

Remuneration from Patients/Clients

Interns, trainees, and applicants shall not receive any remuneration from patients or clients, and shall only be paid by their employers.

Where Services May Be Provided

Trainees, interns, and applicants shall only perform services at the place where their employers regularly conduct business, which may include performing services at other locations, so long as the services are performed under the direction and control of their employers and supervisors and in compliance with the laws and regulations pertaining to supervision. For example, an intern working in private practice may see a patient in the hospital. Or, a trainee may see a patient who is homebound, on behalf of the agency that employs him/her, in the home of the patient.

Private Practice

Interns must be "registered" at the time employment in a private practice begins. Interns must be in their initial six-year intern registration period while gaining any hours of experience in private practice.

Supervision in Private Practice by Someone Other Than Employer

The supervising licensee in a private practice shall either be employed by and practice at the same site as the intern's employer, or shall be an owner or full-time employee of the private practice.

Supervision when Supervisor is on Vacation or Sick Leave

Alternative supervision may be arranged during a supervisor's vacation or sick leave if the supervision otherwise meets the requirements of the licensing law.

Lawful Employment Settings for Trainees

A trainee may gain experience as an employee or volunteer in any setting that lawfully and regularly provides mental health counseling or psychotherapy; provides oversight to ensure that the trainee's work at the setting meets the experience and supervision requirements required by law, is within the scope of practice for the profession, and is not a private practice. All hours of experience gained as a trainee must be coordinated between the school and the site where the hours are being accrued. The school must approve each site and must have a written agreement with each site.

Lawful Employment Settings for Interns

Registered interns may work in all of the settings in which trainees may work, and in addition, they may, during their initial six-year intern registration, be employed or volunteer in private practices.

Lawful Employment Settings for Applicants for Intern Registration

A person who is post-degree, awaiting intern registration, may work in any setting appropriate for a trainee, and may not work in private practice. Persons who are in their second six-year intern registration period may likewise not work in private practice.

Ownership of a Practice or Business

Trainees and interns shall have no proprietary (ownership) interest in their employers' businesses and shall not lease or rent space, pay for furnishings, equipment or supplies, or in any other way pay for the obligations of their employers. This means that interns

and trainees will not be signers on joint checking accounts with employers, pay remodeling costs for office space, pay advertising costs, etc.

Employee vs. Volunteer

The requirements of law and regulation are applicable equally to persons who are employees and persons who are volunteers. Do not presume that if you are a volunteer and law or regulation says “employee,” that it does not apply to you. You are bound by the same requirements whether you are an employee or a volunteer.

Responsibility Statement for Supervisors

This statement is to be signed by the supervisor prior to commencing supervision with an intern, trainee, or applicant. These forms are on the BBS website at www.bbs.ca.gov. Interns are to submit Supervisor Responsibility Statements to the Board for all supervisors upon application to take the examinations for licensure.

Notification of Change of Address

Licenses, registered interns, and applicants are required to notify the BBS within 30 days of a change of address. The form can be found on the BBS website. 

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Sample Letter of Agreement for Offsite Supervision

This is not a form. This is suggested information that should appear on the letterhead of the employer and should be signed and dated prior to gaining hours of experience.

This document is referred to as “the letter of agreement for offsite supervision.” This is frankly a misstatement as this letter is to exist when the supervisor is not paid by the intern’s/trainee’s employer for the provision of supervision, (i.e., the supervisor volunteers to provide the supervision or the supervisor is paid by the supervisee). Typically, this situation occurs when there is no qualified supervisor “onsite,” thus, the commonly used phrase, “offsite supervision.” Such an agreement is permitted in all work setting except private practice.

SAMPLE LETTER OF AGREEMENT¹

It is hereby agreed that _____
(Supervisor) hereinafter referred to as supervisor, agrees to supervise the intern/trainee listed below for _____
(Employer/Organization). Supervisor agrees to provide this service to _____
(Employer/Organization) on a voluntary basis.² _____
(Employer/Organization) agrees to allow _____
(Supervisor) to supervise the intern/trainee listed below. Supervisor agrees to ensure that the extent, kind, and quality of counseling/psychotherapy performed by the intern or trainee, is consistent with the intern or trainee’s training, education, and experience and is appropriate in extent, kind, and quality.

Employer is aware of the licensing requirements that must be met by the intern or trainee and agrees not to interfere with the supervisor’s legal and ethical obligations to ensure compliance with those requirements, and employer agrees to provide the supervisor access to clinical records of the clients, counseled by the intern or trainee.

Supervisor agrees to ensure that the counseling/psychotherapy performed by the intern or trainee listed below and the supervision provided by the supervisor will be in accordance with Chapter 13, Division 2 of the Business and Professions code (the MFT Licensing Law) and any regulations promulgated thereunder. The intern/trainee listed below is employed by the _____
(Employer/Organization) and performs counseling/psychotherapy services of a nature specified in Chapter 13, Division 2 of the Business and Professions Code and any regulations promulgated thereunder.

<i>Trainee/Intern (print)</i>	<i>Supervisor (print)</i>	<i>License</i>	
<i>Trainee/Intern (signature)</i>	<i>Supervisor (signature)</i>		
<i>Employer/Organization (print name)</i>			
<i>Street</i>	<i>City</i>	<i>State</i>	<i>Zip</i>
<i>Authorized Representative (print name and title)</i>			
<i>Dated</i>	<i>Authorized Representative (signature)</i>		

¹This Letter of Agreement is to be signed and dated prior to providing services, which are to be counted as hours of experience.
²Although the supervisor provides service for employer on a voluntary basis, the intern or trainee may lawfully pay the supervisor for supervision.

The intern/trainee shall maintain an original of this letter of agreement for each work setting where the letter is necessary and shall submit this letter with the application for the license/exam.