#### COUNTY OF SONOMA DEPARTMENT OF HEALTH SERVICES BEHAVIORAL HEALTH DIVISION: MENTAL HEALTH SERVICES AND SUBSTANCE USE DISORDERS AND COMMUNITY RECOVERY SERVICES



#### POLICY

Sonoma County Behavioral Health Division (SCBH) has a uniform process for credentialing and recredentialing of providers that addresses acute, primary, behavioral, substance use disorders, and long-term services and support providers, as appropriate. SCBH selection policies and procedures do not discriminate against particular providers that serve high-risk populations or specialize in conditions that require costly treatment.

It is the policy of SCBH to conduct screenings prior to hiring or contracting with independent healthcare providers to confirm licenses/registrations and/or certifications are in compliance with Medi-Cal and Medicare requirements. SCBH will monitor to ensure that healthcare providers maintain all required licenses/registrations and/or certifications in good standing.

Any candidate who is suspended or excluded from participation in federal or state funded healthcare programs, whose license/registration and/or certification is not current, or whose background check reveals issues that would preclude his or her employment/contract with SCBH or the ability to fulfill the terms of a contract with SCBH will not be hired nor will a contract be executed with the individual.

#### PROCEDURE

#### **HIRING PROCEDURES – POTENTIAL EMPLOYEES**

During the recruitment process, candidates for employment are required to provide documentation of relevant education, earned degrees and licenses, registrations and/or certifications.

- 1. Prior to completion of the hiring process, DHS Human Resources personnel conducts a background check that includes:
  - a. Verification of education through available online data bases that includes dates of enrollment, graduation dates, and degrees earned. In cases where candidate information is not available through on-line sources, DHS obtains copies of relevant degrees and/or

transcripts. These documents are used to inform direct, primary source verification of education.

- b. Verification of current licensure/registration/certification will be verified using documentation provided by the candidate and available websites including a review for any reported public record actions, including, but not limited to:
  - Administrative Disciplinary Actions
  - Court Orders
  - Misdemeanor Convictions
  - Felony Convictions
  - Malpractice Judgments
  - Licensed with Public Letter of Reprimand
  - Administrative Citation Issued
  - Administrative Action Taken by Other State or Federal Government
  - Arbitration Awards
- c. Verification of a current Drug Enforcement Administration (DEA) license or furnishing number, if applicable, will be obtained by the candidate providing a copy of their current license/number.
- d. California licensed prescribers authorized to prescribe, order, administer, furnish or dispense Schedule II through IV controlled substances are required to register for access to Controlled Substance Utilization Review and Evaluation System (CURES 2.0). Upon hire, DHS HR will obtain evidence of registration.
- e. Verification that the candidate is not suspended or excluded from participation in federal or state funded healthcare programs by checking the following databases:
  - 1. Office of Inspector General-- List of Excluded Individuals/Entities (LEIE)
  - 2. The State Medi-Cal List of Suspended or Ineligible Providers (LSIP)
  - 3. The System for Award Management (SAM)
  - 4. The Social Security Death Master File
- f. At the time SCBH employees are enrolled in the County's billing system, the accuracy of their National Provider Number (NPI) is verified in the National Plan and Provider Enumeration (NPPES) system.

## NEW AND RENEWED INDEPENDENT PROVIDER CONTRACTS

SCBH staff conduct the following tasks prior to the execution of any new contract or renewal of an existing contract with an independent provider. Completion of each task is documented in a spreadsheet including the date completed and the evidence is kept on file.

- a) Obtain a copy of the professional license and review California BreEZe and any other applicable website for evidence of current licensure/registration/certification. The expiration of the license/registration/certification will be monitored.
- b) Request a current copy of DEA License and furnishing number for applicable medical providers (except for IMD MD's). Retain an electronic copy of the DEA license/furnishing number and monitor the expiration of the license.
- c) Upon hire, SCBH will obtain evidence of registration for access to Controlled Substance Utilization Review and Evaluation System (CURES 2.0).California licensed prescribers authorized to prescribe, order, administer, furnish or dispense Schedule II through IV controlled substances are required to register as of July 1, 2016.
- d) For psychiatrists, request evidence of completion of an accredited psychiatric residency program.
- e) Review the following state and federal sanctioned provider lists:

- Office of Inspector General-- List of Excluded Individuals/Entities (LEIE)
- State Medi-Cal List of Suspended or Ineligible Providers (LSIP)
- The System for Award Management (SAM)
- The Social Security Death Master File (for new independent contractors only)
- f) Request evidence of, or declination statement for (a) (e): (a) proof of Tuberculosis ("TB") skin test ("Mantoux Test") within previous twelve (12) months, repeated annually; (b) proof of immunization or immune titers to Measles ("Rubeola"), Mumps, German Measles ("Rubella"), and Chickenpox ("Varicella"); (c) proof of Tetanus, Diphtheria, and acellular Pertussis ("Tdap") booster immunization, and Tetanus and Diphtheria (Td) booster immunization every 10 years; (d) proof of immunization or immune titers to Hepatitis B; and (e) proof of annual Influenza vaccination.
- g) Request evidence of medical evaluation, clearance, training, and fit testing for Personal Protective Equipment ("PPE"), including N95-rated respirators and/or Powered Air Purifying Respirators ("PAPR") on hire and annually thereafter, including elements required by the Cal/OSHA Respiratory Protection Standard. Upon contract? Or once brought on?
- h) At the time SCBH contract providers are enrolled in the County's billing system, the accuracy of their National Provider Number (NPI) is verified in the National Plan and Provider Enumeration (NPPES) system.

#### CURRENT CONTRACTORS (INDEPENDENT AND CBO's)

DHS staff or a delegated contractor (e.g., OIG Compliance Now) conducts a monthly review of all independent contractors by screening them against three exclusion databases (LEIE, LSIP and SAM). Behavioral Health contracted Community Based Organizations (CBO) are also required to conduct these monthly screenings. In the event that an independent contractor or CBO employee is suspended or excluded from participation, DHS Compliance Officer will be notified immediately and the provider will be immediately inactivated in the County claiming system and cannot provide services to County clients. The DHS Compliance Officer will work with County Counsel and Behavioral Health to determine next steps.

Behavioral Health contracted Community Based Organizations (CBO) are also required to monitor employee licenses/registrations/certifications that are expired or soon to expire on a monthly basis. SCBH contract staff does the monthly review of licenses of independent contractors. In the event that a CBO employee or independent contractor has an expired license/registration/certification, the individual is immediately inactivated in the County claiming system and cannot provide services to County clients.

Any disciplinary action with the relevant licensing board or Exclusion from participation may result in a termination of the agreement with the independent or CBO contractor.

#### **CURRENT EMPLOYEES**

#### Monthly Excluded Provider Screenings and License/Registration/Certification Review

DHS staff or a delegated contractor (e.g., OIG Compliance Now) conducts a monthly review of all current DHS employees by screening them against three exclusion databases (LEIE, LSIP and SAM). In the event that an employee is suspended or excluded from participation, DHS Compliance Officer will be notified immediately and the staff will be immediately inactivated in the County claiming system and cannot provide services to County clients. The DHS Compliance Officer will work with County Counsel and Behavioral Health to determine next steps.

DHS Human Resources provides a monthly list of SCBH employee licenses/registrations/certifications that are expired or soon to expire. Both DHS Human Resources and BH Quality Assurance monitor these expirations and ensure that all providers remain current. In the event that an employee has an expired license/registration/certification, the individual is immediately inactivated in the County claiming system and cannot provide services to County clients.

Any employee disciplinary action will be managed in accordance with due process rights and Civil Service Rules.

#### INTERNS AND UNLICENSED STAFF

#### **Board of Behavioral Sciences Interns**

Behavioral Health Clinician Interns are registered with the Board of Behavioral Sciences (BBS) while obtaining the required clinical experience and supervision necessary for licensure. Behavioral Health Clinical Interns who are hired by DHS sign a statement upon hire stating that the intern is expected to obtain licensure within three (3) years of hire. Registered interns are permitted to provide Mental Health Services under the supervision of licensed staff as long as their registration remains current.

Mental Health Services refers to those types of services that require the practitioner to hold a license.

In the event that an on-site clinical supervisor is not available, the BBS Off-Site Supervision Agreement requests will be reviewed and approved on a case-by-case basis. See Off-Site Supervision Agreement *Procedures*.

#### **Substance Use Disorder Providers**

Substance Use Disorders (SUD) providers must be registered, certified or licensed pursuant to the requirements as defined by California regulations for certification of Alcohol and Other Drug Counselors. Prior to hire, employees must provide proof of current registration, license and/or certification as detailed in the hiring procedures listed above. Licensed professionals providing SUD counseling services are not required to become certified as an Alcohol and Other Drug Counselor.

Registered Alcohol and Other Drug Counselors will have 5 years from the date of initial registration to obtain certification from a National Commission for Certifying Agencies (NCCA) accredited organization. Both DHS Human Resources and BH Quality Assurance track registered employees to ensure that they are certified within the time allotted.

DHS Human Resources and BH Quality Assurance track and log all certifications, registrations and licenses to ensure they remain current and are renewed timely to avoid expiration.

#### Waivered Professionals

In accordance with state law, psychologist candidates and out-of-state licensees may provide Mental Health Services by obtaining a waiver granted by the California Department of Health Care Services (DHCS).

The following individuals are eligible to apply for a waiver:

1. Psychologist Candidate - includes Registered Psychologist and Psychological Assistant. To be eligible for waiver, the psychologist candidate must have successfully completed 48

- A letter from the appropriate licensing board which states that the applicant has sufficient experience to gain admission to the licensing examination.
- Practitioner's Current Resume

Waivers issued to out of state licensees are valid for three (3) years. The waiver period runs continuously, even if the individual has received a waiver from another county. There are <u>no</u> provisions that allow for an extension of a waiver.

All acceptance and monitoring of waivers will be completed by BH Quality Assurance staff.

Waivers are not transferable from one County Mental Health Plan to another County Mental Health Plan. If SCBH hires an individual from another county with a valid waiver, SCBH will submit a waiver application and required documents to DHCS.

#### PROVIDING AND CLAIMING FOR MENTAL HEALTH SERVICES

All providers, including employees and contractors, must obtain a staff number prior to providing and claiming for Mental Health Services. See *Medi-Cal Mental Health Service Provider Credentialing Procedures* for requirements.

#### SCBH FORMS:

MHS 144 Staff Number Request Form

#### ATTACHMENT:

- 1. Medi-Cal Mental Health Service Provider Credentialing Procedures
- 2. Off-Site Board of Behavioral Sciences Supervision Agreement Procedures

# Sonoma County Department of Health Services Behavioral Health Division Mental Health Services

# Medi-Cal Mental Health Provider Credentialing Procedure 3/30/17

The following procedure describes the necessary steps for a provider to become authorized to provide and claim for specialty mental health services (SMHS) as part of the Sonoma County Mental Health Plan (MHP). Authorized providers are given a unique staff number for use in Medi-Cal claiming. These procedures apply to <u>both</u> Sonoma County Behavioral Health (SCBH) staff as well as providers from SCBH contractors upon enrollment in the County billing system.

The Medi-Cal Provider Credentialing Procedure must be followed when:

- 1. A new provider requests to provide specialty mental health services as part of the MHP;
- 2. A current provider requests a change in their provider status;
- 3. A current provider no longer meets the requirements for their credentialing category;
- 4. Upon request from the SCBH Credentialing Committee

Providers of SMHS fall into five credentialing categories and include:

#### I. LICENSED STAFF

- 1. Physician (M.D., D.O.)
- 2. Licensed Psychologist (Ph.D., Psy.D.)
- 3. Licensed Clinical Social Worker (LCSW)
- 4. Licensed Marriage and Family Therapist (LMFT)
- 5. Licensed Professional Clinical Counselor (LPCC)
- 6. Registered Nurse (RN)
- 7. Licensed Vocational Nurse (LVN)
- 8. Psychiatric Technician (PT)
- 9. Other Medical Professionals (i.e., PA's and PNP's)

#### **II. WAIVERED PROFESSIONALS**

- 10. Registered Psychologist
- 11. Registered Psychological Assistant
- 12. Out of State licensees

#### **III. REGISTERED INTERNS**

- 13. Registered Marriage and Family Interns (MFTi)
- 14. Registered Associate Clinical Social Workers (ASW)
- 15. Registered Professional Clinical Counselor Intern (PCCi)

#### **IV. GRADUATE STUDENTS**

16. Master's and Doctoral Degree candidates

#### V. UNLICENSED WORKERS

- 17. Mental Health Rehabilitation Specialists
- 18. Adjunct Mental Health Staff (those not meeting above categories)

# Procedure

- Contracted providers must complete MHS 144-Staff Number Request Form and submit it (along with the required documents for their credentialing category) to the Claims Unit. Required documents are listed below, along with the approved mental health activities for each type of provider. SCBH staff will submit the required documents to Human Resources at the time of hire but may be asked to provide current or updated documentation by the Claims Unit or Quality Assurance when needed.
- The Claims Unit will ensure that all providers have a valid National Provider Identifier (NPI) number and are registered with the National Plan and Provider Enumeration System (NPPES) under the correct taxonomy.
- The Claims Unit will obtain copies of any relevant license/registration/certification and check the California BreEZe or other applicable website to confirm that the license/registration/certification is current.
- 4. The Staff Number Request form and supporting documentation (see below credentialing categories for requirements) will be reviewed and approved by Quality Assurance. Any provider credentialing requests that do not meet the minimum requirements will be asked to provide additional information and/or may be reviewed by the Credentialing Committee.
- 5. When approved, a staff number will be issued to provider along with an <u>effective date</u>. Services may be provided and claimed for by the provider using the assigned staff number beginning with the effective date. Any services provided prior to the effective date are not billable.
- 6. SCBH Staff will be set up in the Avatar electronic health record in accordance with their credentials/scope of practice following staff number assignment.
- 7. <u>Providers must notify Quality Assurance *immediately* if their provider status changes in any way. This may include an expired license/registration, name change, or a change in educational or new licensure/registration status. Providers cannot provide and claim for SMHS if they do not meet the requirements of their credentialing category.</u>

# **Required Documents and Approved Activities**

## LICENSED STAFF

#### 1. Physician

- a. Copy of current Drug Enforcement Administration (DEA) license.
- b. Copy of current Physician license from the Medical Board of California
- c. Evidence of completing an accredited psychiatry residency program (i.e. certificate, letter OR Board certification in psychiatry)
- d. Evidence of registration with Controlled Substance Utilization Review and Evaluation System (CURES 2.0).

#### 2. Psychologist

a. Copy of current license from the California Board of Psychology

#### 3. LCSW, LMFT and LPCC

a. Copy of current license from the California Board of Behavioral Sciences

b. LPCC's must provide documentation from the Board of Behavioral Sciences confirming that they meet the necessary educational/experiential requirements prior to working with couples and families.

#### 4. Registered Nurse

- a. Copy of license from the California Board of Registered Nursing
- b. Evidence of experience/training in psychiatric nursing

#### 5. Licensed Vocational Nurse and Psychiatric Technician

- a. Copy of license from the California Board of Registered Nursing and Psychiatric Technicians
- b. Evidence of experience/training in psychiatric nursing

#### 6. Other Medical Professionals

Other medical professionals such as Physician Assistants (PA) and Nurse Practitioners (NP) may become enrolled as network providers per standardized procedures and credentialing is reviewed by the Medical Director.

#### Licensed Staff Approved Activities

- Can function as a "Head of Service" on agency application
- Can authorize services as directed by the County
- Can conduct comprehensive assessments and provide a diagnosis without co-signature (except for RN staff, as providing a mental health diagnosis is out of their scope of practice unless extended through a standardized procedure).
- Can co-sign the work of other staff members within their scope of practice
- Can provide and claim for all Mental Health Service categories within their scope of practice (example, a psychiatrist and registered nurse can claim for Medication Support Services, however, psychologists, LCSWs, LMFTs and LPCCs cannot)
- Licensed staff cannot provide any services that require licensure if their license is expired.

#### WAIVERED PROFESSIONALS

- 1. <u>Registered Psychologists/Psychological Assistants</u>
  - a. Department of Health Care Services (DHCS) Waiver (requested by SCBH Quality Assurance)
  - b. Copy of current registration with the California Board of Psychology as a Registered Psychologist or Psychological Assistant.
  - c. Diploma or transcripts showing at least 48 semester/trimester or 72 quarter units of graduate coursework completed, not including thesis, internship or dissertation
  - d. Current resume

#### 2. Out of State Licensees

- a. DHCS Waiver (requested by SCBH Quality Assurance)
- b. Letter from the appropriate California licensing board stating that the licensee has sufficient experience to gain admission to the licensing examination
- c. Copy of license/registration with their respective state licensing board

#### Waivered Professional Approved Activities

- Waivered professional may perform the following activities <u>under the supervision of a licensed</u> professional within their scope of practice:
- Can function as a LPHA staff for the time dictated by the County and the DHCS waiver
- **Note:** Waivers are valid for five (5) years. The waiver period runs continuously, even if the Medi-Cal Provider Credentialing Procedure

Previous Revision Date: n/a

Individual has received a waiver from another county. There are no provisions that allow for an extension of the waiver.

- <u>Cannot</u> function as the Head of Service unless they meet qualifications dictated by the California Code of Regulations.
- Can authorize services as directed by the County
- Can conduct comprehensive assessments and provide a diagnosis without co-signature while under waiver.
- Can co-sign the work of other staff members within their scope of practice (other than graduate students performing therapy)
- Waivered Professional staff <u>cannot</u> co-sign for a graduate student's *therapy* work. Therapy work must be co-signed by a licensed professional within their scope of practice.
- Can provide and claim for all Mental Health Services within their scope of practice.
- <u>Cannot</u> hold themselves out as independent practitioners and claim as an Enrolled Network
   Provider
- Waivered staff <u>cannot</u> provide any services that require licensure if their waiver is expired.

#### **REGISTERED INTERNS**

#### 1. MFTi, ASW, PCCi

a. Copy of current registration from the California Board of Behavioral Sciences

#### **Registered Intern Approved Activities**

- Registered Marriage Family Therapist Interns, Associate Social Workers and Professional Clinical Counseling Interns may perform the following activities <u>under the supervision of a licensed</u> professional within their scope of practice:
- Can function as a LPHA staff for the time dictated by the County and DHCS
- Cannot function as the Head of Service unless they meet qualifications dictated by the California Code of Regulations
- <u>Cannot function as a LPHA staff for the time dictated by the County and DHCS</u>
- Can authorize services as directed by the County
- Can conduct comprehensive assessments and provide a diagnosis with co-signature of a licensed supervisor (except for RN staff as assessment leading to diagnosis is not within the RN's scope of practice)
- Can co-sign the work of other staff members within their scope of practice (other than graduate students performing therapy)
- Can provide and claim for all Mental Health Services within their scope of practice
- <u>Cannot hold themselves out as independent practitioners and claim as an Enrolled Network</u>
   Provider
- Registered interns <u>cannot</u> provide any services that require licensure if their registration is expired.

## **GRADUATE STUDENTS**

- 1. Master's and Doctoral Degree Candidates
  - a. Name of graduate school and type of degree program (e.g., Master's, Doctorate, clinical psychology or school counseling)
  - b. Year in the above program (e.g., first-year, second-year student in a two year program)
  - c. Name, and license number of primary clinical supervisor (supervisor must meet all licensing board requirements for supervision of interns)
  - d. Effective dates of employment (start date and end date, if known)
  - e. The above information must be submitted <u>annually</u> until job class update/change or staff number termination.

Medi-Cal Provider Credentialing Procedure Previous Revision Date: n/a

#### Graduate Student Approved Activities

- Graduate Students may perform the following activities under the supervision of a licensed professional within their scope of practice:
- Can conduct comprehensive assessments and client plans, but require a co-signature by a licensed supervisor
- Can write progress notes but require a co-signature by a licensed supervisor
- Can provide and claim for individual and group therapy but require oversight and co-signature of a licensed supervisor
- Can provide and claim for any Mental Health Services within their scope of practice but require oversight and co-signature on all clinical documents by a licensed supervisor (except for RN staff as assessment leading to diagnosis and therapy services are not within the RN's scope of practice)

## UNLICENSED WORKERS

- 1. Mental Health Rehabilitation Specialist
  - a. Job title and description (if not a SCBH employee)
  - b. Evidence of meeting one of the following requirements
    - i. Has a <u>Bachelor's Degree</u> and <u>four years of experience</u> in a mental health setting as a specialist in the fields of physical restoration, social adjustment, or vocational adjustment
      - Up to two years of graduate professional education may be substituted for the experience requirement on a year-for-year basis
      - Up to two years of post-associate degree clinical experience may be substituted for the required educational experience in addition to the requirement for four years' experience in a mental health setting
    - ii. Has a <u>Master's Degree</u> and <u>two years</u> of full-time equivalent (FTE) experience in a mental health setting.
    - iii. Has an <u>Associate's Degree</u> and <u>six years</u> of FTE experience in a mental health setting. At least two of the six years must be post-degree experience.

## MHRS Approved Activities

- Can function as a "Head of Service" on an agency application
- Can co-sign the work of other staff members as allowed by the County within their scope of
  practice (not therapy and assessment)
- Can provide and claim for the following Mental Health Services: Targeted Case Management, Plan Development, Individual/Group Rehabilitation, Crisis Intervention, and Therapeutic Behavioral Services, within their scope of practice (refer to contract/job description)

## 2. Adjunct Mental Health Staff

The County has the prerogative and program flexibility to integrate and define other staff who can provide direct or supportive specialty mental health services as determined by the County administration and approved by DHCS. It should be noted that it is not a requirement that staff are paid for services provided and claimed to Medi-Cal (i.e., staff may include unpaid undergraduate students/interns, volunteers or advocates) as long these unpaid persons meet Medi-Cal rules and regulations regarding claiming and scope of practice. Providers are considered for this job category on a case-by-case basis and requirements are determined by the SCBH director.

# Sonoma County Department of Health Services Behavioral Health Division

# Off-Site Board of Behavioral Sciences Supervision Agreement Procedures 03/30/17

This procedure will be followed when a Sonoma County Behavioral Health (SCBH) manager/supervisor is not available to provide clinical supervision required by the Board of Behavioral Sciences (BBS) to SCBH registered interns (MFTI, ASW, PCCI). The SCBH manager/supervisor is still responsible for administrative supervision, including, but not limited to, timely completion of assessments, client plans, CANS/ANSA reassessments, and progress notes. The supervise is responsible for any costs associated with off-site supervision.

To approve a SCBH registered intern's request for an Off-Site Supervision Agreement, the steps below will be followed:

- A) SCBH intern will discuss the request with SCBH Manager. If it is determined that clinical supervision cannot be arranged with a SCBH manager/supervisor, the request will be forwarded to SCBH Credentialing Committee members.
- B) SCBH Credentialing Committee will consult with senior management and BH Director for review and approval.
- C) If the Off-Site Supervisor Agreement request is approved, SCBH manager/supervisor will be notified. The SCBH manager/supervisor will develop the Off-Site Supervisor Agreement using the BBS Template (attached).

Note: BBS does not allow for changes to the letter as it outlines applicable laws and regulations.

- D) The Off-Site Supervision Agreement must be signed by SCBH intern and Off-Site Supervisor and returned to Credentialing Committee members.
- E) SCBH Credentialing committee will submit the Off-Site Supervision Agreement to DHS Assistant Director for review and signature.
- F) The signed agreement will be returned to SCBH intern and copies will be forwarded to SCBH Director, QA Manager, and SCBH Manager/Supervisor.
- G) SCBH intern and SCBH manager/supervisor will ensure that Authorization for Release of Protected Health Information (MHS 102) is on file for each client before allowing the Off-Site Supervisor access to SCBH client medical records. SCBH medical records or copies will not be taken off the SCBH campus.
- H) The SCBH Manager/Supervisor and the intern are responsible for notifying SCBH Credentialing Committee members of any changes to the Off-Site Supervision Agreement.
- I) For further information, refer to 16 CCR 1820.

#### [INSERT CURRENT LETTERHEAD]

Date:

Intern: Off Site Supervisor: Employer: Date of Commencement:

This letter serves as an agreement between the employer, Sonoma County Department of Health Services (SCDHS), (MFTi/ASW/PCCi intern name), and the intern's off site Supervisor, (supervisor's name).

SCDHS agrees to allow (supervisor's name) to supervise (intern's name). (Supervisor's name) agrees to supervise (intern's name) for SCDHS.

(Supervisor's name) agrees to take supervisory responsibility for the clinical counseling services provided by (intern's name) as required by Chapter 16 of the California Business and Professionals Code and Title 16, Division 18, Article 3 of the California Code of Regulations. (Supervisor's name) shall ensure that the extent, kind and quality of services performed is consistent with (intern's name) training, education, and experience and is appropriate in extent, kind and quality.

SCDHS is aware of the licensing requirements that must be met by (intern's name) and agrees not to interfere with the supervisor's legal and ethical obligations to ensure compliance with those requirements. SCDHS agrees to provide the supervisor access to on-site clinical records with client's written authorization.

Off Site Supervisor's Signature	Date	Intern's Signature	Date
Employer's Authorized Represent	ative Name	Signature	Date