

**DEPARTMENT OF HEALTH
HEALTH REGULATION AND LICENSING ADMINISTRATION**

BOARD OF SOCIAL WORK
AUTHORITY FOR GUIDANCE

April 27, 2020
DATE OF POLICY

20-002
POLICY NO.

POLICY STATEMENT

**GUIDANCE ON REMOTE SUPERVISION
DURING THE COVID-19 HEALTH EMERGENCY**

In light of the current public health emergency, the Board of Social Work (Board) has adopted the following policy and offered this guidance related to the supervision of social work practice in the District. This policy guidance governs practice supervision from February 1, 2020 to December 31, 2020. Further guidance statements will be forthcoming to meet the evolving situation as it develops.

The District social work licenses are available in four (4) types: Licensed Social Work Associate (LSWA); Licensed Graduate Social Worker (LGSW); Licensed Independent Social Worker (LISW); and Licensed Independent Clinical Social Worker (LICSW). These licenses signify not only the holder's educational and training levels but also the scope of lawful, authorized practice for each. It is crucial for licensees and applicants for license to strictly observe and comply with the authorized scope and requirements for each licensure type. In addition, social work students and interns are authorized to practice without a license provided that they practice solely under the appropriate supervision of a social worker licensed in the District.

Only an LICSW may supervise clinical practice of LGSWs, LISWs, students, or interns. An LISW may supervise non-clinical practice of LSWAs, LGSWs, students, or interns.¹ Section 7012.8(a) of Title 17 of the District of Columbia Municipal Regulations (DCMR) requires that at least one (1) of every thirty-two (32) hours of practice must be under immediate supervision, defined as "one-on-one supervision in which the supervisor is physically present with the supervisee and either discussing or observing the supervisee's practice and shall not include telephone communication, video conferencing, or internet communication."

On March 11, 2020, Mayor Muriel Bowser declared the state of public health emergency in the District due to the threat of COVID-19 pandemic. Mayor's Order 2020-045. Following this declaration, the Mayor issued an order prohibiting mass gatherings of fifty (50) or more persons on March 16, 2020. Mayor's Order 2020-048. On March 24, 2020, non-essential businesses are

¹ An LGSW may not supervise social work practice, whether clinical or non-clinical. An LSWA may not perform clinical social work practice or supervise non-clinical practice.

ordered closed. Mayor's Order 2020-053. A stay-at-home order was issued on March 30, 2020, prohibiting District residents from leaving their home except for certain specified essential businesses. Mayor's Order 2020-054.

As a result of these emergency restrictions, health care practitioners are forced provide care through telehealth, which is used here to refer to the practice of health care or provision of care or treatment to clients located in the District remotely through the use of communication technology. To support safe and effective telehealth practice, the Department of Health issued a Guidance dated March 12, 2020 (Guidance) to clarify the standards and requirements for tele-practice.

The Guidance stipulates that health care providers are permitted to delivery health care services to clients through the use of communication technology so long as they conform to the acceptable standards of care and comply with privacy requirements. For additional guidance, providers may consult 17 DCMR § 4618 (Telemedicine), which the Board now temporarily adopts as framework for tele-practice of social work. Further, the Guidance provides that a practitioner may establish new patients via the use of real-time telehealth.

However, **practitioners seeking to practice telehealth to District clients must be properly licensed in the District.** An exception to this requirement applies to practitioners licensed in another jurisdiction who are "temporary agents" of the District in one of two ways: a) the practitioner is providing health care to individuals at a District licensed health care facility; or b) the practitioner is providing continued care based on an existing relationship to a client who returned to the District. Administrative Order No. 2020-02, dated March 13, 2020. Additionally, social work students practicing under appropriate supervision as part of their social work education are also exempt from licensure.

Based on the Guidance above, therefore, the Board has determined that social workers licensed in the District may engage in telehealth practice including providing supervision via communication technology, provided that licensees comply with the applicable standards of care and privacy mandates. All requirements for supervision remain in effect. LSWAs, LGSWs, students, and interns are still required to be supervised in accordance with the provisions mentioned above. Supervision may be conducted via synchronous (telephone and video conferencing) and asynchronous (e-mail and text messaging) communication.

However, the requirement of **"immediate supervision"** is hereby modified to permit **real-time, synchronous communication between the supervisor and the supervisee through the use of appropriate real-time technology such as telephone or audiovisual telecommunication.** The use of technology that does not involve real-time communication, such as e-mail or text messaging, while permissible as part of tele-practice and tele-supervision, does not constitute immediate supervision.

For illustration, an LGSW's practice must be fully supervised and the supervisor may utilize either synchronous or asynchronous means of communication. However, for every thirty-two

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(32) hours of the supervisee's practice, they must receive at least one (1) hour of immediate supervision conducted via synchronous means of communication.

This policy is applicable to social work practice and supervision between February 1, 2020 and December 31, 2020.

Accordingly, social workers and students accruing hours of supervised practice may do so via the use of telehealth, tele-practice, and tele-supervision in accordance with this Policy Statement.

All inquiries pertaining to the practice of social work, including the continuing education requirements, may be directed to the Board's Health Licensing Specialist, Ms. Mavis Azariah Armattoe, at 202-442-4782 or mavis.azariah@dc.gov.