

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

BOARD OF MARRIAGE AND FAMILY THERAPY
AUTHORITY FOR GUIDANCE

June 8, 2020
DATE OF POLICY

20-001
POLICY NO.

POLICY STATEMENT

**MODIFICATION OF FACE-TO-FACE REQUIREMENT IN
CLIENT CONTACT, SUPERVISION, AND CONTINUING EDUCATION
DURING THE COVID-19 HEALTH EMERGENCY**

In light of the current public health emergency, the Board of Marriage and Family Therapy (Board) has adopted the following policy and offered this guidance related to the requirement of live, face-to-face interaction related to client contact, continuing education (CE), and supervision. This Policy is in effect until December 31, 2020. The Board may issue revised or updated policy statement as the situation develops.

Chapter 77 of Title 17 of the District of Columbia Municipal Regulations (DCMR) regulates the practice of marriage and family therapy. The regulation contains the following requirements:

- An applicant for marriage and family therapy license must have accrued two (2) years of post-graduate supervised clinical experience which, *inter alia*, must include at least 1,000 face-to-face direct client contact hours. 17 DCMR § 7703.3(c).
- The supervision of the experiential requirement noted above must include one (1) hour of direct supervisory contact. 17 DCMR § 7703.3(h). Direct supervisory contact is defined as in-person, face-to-face meeting between the supervisor and the supervisee. 17 DCMR § 7799.1.
- Supervisor of individuals seeking to accrue post-graduate supervised clinical experience (referenced above) in the District must be either an American Association of Marriage and Family Therapy (AAMFT)-approved supervisor or one that has been approved by the Board. A Board-approved supervisor must complete six (6) hours of Board-approved supervision CE, three (3) of which must be obtained in a live, in-person, face-to-face setting. 17 DCMR § 7712.10(c). A Board-approved supervisor may continue to provide supervision of practice through each licensure term by completing the same supervision CE noted above. 17 DCMR § 7712.10(d).

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- Licensed marriage and family therapists (MFTs) seeking to renew the license must complete thirty (30) hours of approvable CE, fifteen (15) of which must be in a live, face-to-face setting. 17 DMCR § 7707.4(a). The requirement is also applicable to individuals seeking to reinstate or reactivate the license.

On March 11, 2020, the Mayor 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, Mayor Muriel Bowser 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 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. Similar measures have also been adopted in all U.S. states and territories.

As a result of these emergency restrictions, it has become clear that licensees and applicants will face the impossibility or at least difficulty in obtaining the required CE, client contact, or post-graduate supervised clinical experience. The Board has therefore voted to modify the live, in-person, face-to-face requirements of all regulatory provisions described in the list above so that the CE, supervisory interaction, or client contact required to be live, in-person, face-to-face may hereby be satisfied by the CE, supervisory interaction, or client contact occurring remotely via communication technology; however, such activity or technology must be synchronous, allowing the parties involved to communicate and interact in real time without the need for recording or pre-recording intervention. Synchronous communication includes real-time, simultaneous telephone, tele-conference, videoconference, or live webinars. Recorded messages, e-mails, texting, pre-recorded webinars or presentations DO NOT constitute synchronous communication or interaction and may not substitute for any required live, in-person, face-to-face interaction.

Accordingly, an individual accruing post-graduate supervised clinical experience may count real-time, synchronous contact with clients via telephone, tele-conference, or videoconference as part of the required 1,000 hours of face-to-face direct client contact pursuant to 17 DCMR § 7703.3(c). Likewise, a licensee seeking license renewal may count CE hours completed via live, interactive webinars as the hours required to be live, face-to-face pursuant to 17 DCMR 7707.4(a).

This policy is in effect between March 11, 2020 and December 31, 2020.

While the implication of this policy may be obvious, the Board nevertheless also advises licensees that live, in-person educational programs, supervisory interaction, or client contact completed before, during, or after the public health emergency declaration will also be accepted.

Further, renewing licensees are advised that all other CE requirements continue to be effective, such as the required six (6) hours of ethics, two (2) hours of LGBTQ, and ten (10) percent of public health priority subjects, identified in the following notice:

<https://dchealth.dc.gov/page/policy-statement-identifying-public-health-issues-continuing-education>.

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All inquiries pertaining to the practice of marriage and family therapy, including the CE requirements, may be directed to the Board's Health Licensing Specialist, Mr. Kevin Waugh, at 202-724-7325 or kevin.waugh@dc.gov.