

November 29, 2022,

Official Statement Regarding HB366 and need for increased qualified supervision training,

Thank you for all your time and efforts on behalf of the mental health professions. We recognize your dedication to providing access to supervision for those pursuing a license in mental health.

When HB366 was passed in 2019, the supervision regulations were changed to allow Licensed Clinical Social Workers (LCSW), Clinical Mental Health Counselors (CMHC), and Licensed Marriage and Family Therapists (LMFT) to supervise across professions. The long-standing MFT Licensing Act Rule requiring MFT supervision training remained in place. This training now extends to those licensed mental health practitioners outside the MFT discipline who will supervise AMFTs. While HB366 poses a number of major challenges for mental health professionals in Utah, such as portability, it has resulted in us coming together as associations to organize, strategize, and plan ways to address our shared concerns. We would be happy to work with you and others to explore more effective ways to address workforce shortages and supervision access.

In 2019, UMHCA, UAMFT, and NASW-UT joined together in support of maintaining qualified supervisor training requirements for those mental health professionals who meet DOPL requirements (2-years post independent practice) to obtain certification by completion of a UAMFT sponsored course to supervise AMFTs. We have seen success in this model and are proposing a similar model for LCSWs, LMFTs, and CMHCs to engage in supervision of ACMHCs and CSWs. NASW-UT and UMHCA have developed a qualified supervisor certification program to address the unique supervision needs of cross-discipline supervision.

Education is crucial as we train students and graduates across professions. Marriage and Family Therapists, Clinical Social Workers, and Clinical Mental Health Counselors all have a unique opportunity to offer their expertise and insight through each discipline's unique perspective, ethical standards, and training. NASW-UT, UMHCA, and UAMFT are supportive of additional qualified supervision training for CMHCs and LCSWs and believe it will provide a benefit to new mental health professionals as it targets the uniqueness of each profession and sets standards for best practice.

In order to ensure high quality supervision and promote optimal services to the general public, we have identified several best practices of ethical supervisors that choose to provide cross-professional supervision:

- Completion of a 20-hour UAMFT supervision course to supervise AMFTs (currently in law)
- Completion of an 8-hour UMHCA & NASW-UT supervision course to supervise CSWs & ACMHCs including:
 - Ethical issues in supervision (AMHCA & NASW Code of Ethics, Ethical Decision-Making Models, Confidentiality, Impaired supervises, dual relationships)
 - Models of Supervision
 - Review of UT laws & rules related to supervision and tele-health
 - Supervision Best Practices (documentation, crisis & risk management, etc.)
- Ongoing continuing education from the profession of the supervisee(s)
- Compliance with the DOPL supervision contract certification process
- Cross-profession mentoring and/or supervision of supervision
- Encouraging supervisees to find a mentor within their profession

Ideally, the above ethical best practices of cross-professional supervision will be adopted by statute and/or rule. Either way, as mental health professional associations in Utah, we are jointly committed to doing all we can to promote these standards of supervision in our state. We recognize your desire to increase access to supervision and we are committed to working together as associations to do so while maintaining high standards of quality.

Thank you,

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