



Policy:	99-04.1 (Temporary)
Subject:	Waiver/Registration in Lieu of License – Grace Period Temporary Policy
Authority:	Welfare and Institutions Code, Section 5751.2, as Amended by Chapter 279, Section 3, Statutes of 2020
Original Policy Date:	December 19, 2022
Amended:	October 25, 2001; February 15, 2005; November 13, 2013; December 19, 2022
Supersedes:	N/A
Attachments:	E: Employee Attestation of Temporary Policy

1.0 BACKGROUND

BHRS Policy 99-04: Waiver/Registration in Lieu of License allows staff to serve in a PSW I or and MFT I Classification as a Registered Candidate with the Board of Behavioral Sciences (BBS), which changed the period of registration from three to six years, and the policy allows the staff’s registration to be renewed after three years for a total of six years. In 2022, it was discovered that staff had been registered multiple times for more than 6 years, which was not allowed under the policy, so the policy is updated to reflect a six-year maximum with no exceptions. The Job Specifications for Psychiatric Social Worker, Marriage & Family Therapist, and Psychologist classifications were modified to reflect a six-year maximum.

2.0 PURPOSE

The purpose of this policy is:

- 2.1 To allow current unlicensed PSWI/MFTI staff who are beyond the six-year maximum for registered candidates as of January 1, 2023, a one year grace period to achieve licensure.
- 2.2 Any unlicensed PSW I/MFT I described in 2.1 that has not received their license by January 1, 2024, would be given the opportunity to voluntarily demote to a County job classification that does not require licensure (e.g. Mental Health Counselor I/II) that is vacant and available. Should a lower level position not be available, the employee would need to communicate with their supervisor/manager their plans to resign their position. If the staff fails to obtain the requisite license by January 1, 2024, and chose not to resign their position, the Department will move forward with appropriate disciplinary action up to and including dismissal for not meeting the requirements of the position.

3.0 POLICY



- 3.1 All existing registered PSW I and MFT I employees that have been registered for more than six years as of January 1, 2023, will have until January 1, 2024, to achieve their requisite LCSW or MFT license.
- 3.2 Any existing registered PSW I or MFT I employee that was registered for six or more years on January 1, 2023, and has not become licensed by January 1, 2024, shall be given the opportunity to voluntarily demote to a County job classification that does not require licensure (e.g. Mental Health Counselor I/II) that is vacant and available.
- 3.3 Any existing registered PSW I or MFT I employee that was registered for six or more years on January 1, 2023, and has not become licensed by January 1, 2024, and does not chose to voluntarily demote to a County job classification that does not require licensure that is vacant and available, or chooses not to resign their position, the Department will take appropriate personnel action up to and including dismissal.
- 3.4 Any existing registered PSW I or MFT I employee that was registered for six or more years on January 1, 2023, and has become licensed by January 1, 2024, shall provide proof of the licensure to BHRS Quality Management, which will verify licensure, and to BHRS Personnel Office.
- 3.5 There are no exceptions to this policy.
- 3.6 BHRS will not recognize any additional approved registrations for this group of employees that is valid after January 1, 2024.
- 3.7 Any current unlicensed PSW I or MFT I employee that was registered by the applicable board for six or more years on January 1, 2023, shall sign the attached form (Attachment E) attesting and acknowledging this temporary policy, understand the consequences of not being licensed by January 1, 2024, and agree to abide by the policy.
- 3.8 This policy does not apply to medical staff.
- 3.9 This temporary policy shall expire on January 1, 2024.

Approved: _____
Signature on File
Lisa Mancini, Interim Director
Behavioral Health and Recovery Services

Approved: _____
Signature on File
Scott Gruendl, MPA, CPCO
Compliance Officer