



LICENSING ALERT

Richard H. Lee
Deputy Secretary
for Quality Assurance

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Division of Drug and Alcohol Program Licensure
Licensing Alert 4-02

STAFFING REGULATIONS REQUIREMENTS FOR DIRECT OBSERVATION AND CLOSE SUPERVISION OF COUNSELOR ASSISTANTS

Since implementation of Chapter 704 Staffing Requirements for Drug and Alcohol Treatment Activities on March 4, 1996, there has been at times some confusion relating to the requirement for documenting the periods of direct observation and close supervision which is required by **28 Pa. Code § 704.9 Supervision of Counselor Assistant**.

Direct observation is defined by regulation as follows: "In person observation of staff working in a clinical setting for the purpose of planning, oversight, monitoring and evaluating their activities".

In accordance with 28 Pa. Code § 704.9(a), a counselor assistant must be supervised by a full-time clinical supervisor or a full-time counselor. The fully qualified clinical supervisor or counselor is then responsible for weekly supervision notes relating to the counselor assistant. Clear documentation in the weekly notes and in the pertinent client charts must also demonstrate that direct observation is occurring. These notes must be current and are to be made available to the Licensing Specialist or other Department of Health staff upon request.

Close supervision is defined by regulation as follows: "Formal documented case review and an additional hour of direct observation by a supervising counselor or a clinical supervisor once a week".

Supervision is to focus on the development of the counselor assistant's clinical skills. Weekly supervision notes must clearly demonstrate that close supervision is occurring. The weekly notes should also provide a reference to the charts that will demonstrate that at least one hour per week of direct observation is being conducted.

One acceptable method of documenting direct observation is to have both the counselor assistant and the supervising counselor co-sign the progress notes in the chart. A discussion of this direct observation should be included in the corresponding supervisory note.

28 Pa. Code § 704.9(c)(5) states that “a counselor assistant with a high school diploma or GED equivalent...may counsel clients only under the direct observation of a trained counselor or clinical supervisor for the first 3 months of employment. For the next 9 months, the counselor assistant may counsel clients only under the close supervision of a lead counselor or a clinical supervisor”.

In accordance with 28 Pa. Code § 704.8(a), a counselor assistant who does not meet the educational and experiential qualifications for the position of counselor, but who has a college degree in a field other than a human service area, may counsel clients under the direct observation of a trained counselor or clinical supervisor for the first 3 months of employment. For the next 9 months, the counselor assistant may counsel clients only under the close supervision of a lead counselor or a clinical supervisor.

Please refer to Licensing Alert 4-98 Staffing Regulations Qualifications/Degree in a Related Field, for additional information on approved degrees. The experiential qualifications refer to the number of years of clinical experience in a health or human service agency. Experience as a case manager or support staff where clinical treatment activities were not a part of the job description does not meet this requirement. See also Licensing Alert 2-99, Verification of Training, Experience and Professional Licensure or Certification for additional clarification.

Questions regarding this alert should be directed to Carol Bashore, Arvida Wanner or Frank Miller at (717) 783-8675.