


LICENSING ALERT


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Deputy Secretary for Department
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Division of Drug and Alcohol Program Licensure
Licensing Alert 01-15

28 PA. CODE SECTION 704.9 Supervision of Counselor Assistants

28 Pa. Code § 704.9(a) requires that a counselor assistant be supervised by a full-time clinical supervisor or counselor who meets the qualifications in 28 Pa. Code §§ 704.6 or 704.7. 28 Pa. Code § 704.9(c) addresses the length of time and type of supervision required. The Department's drug and alcohol treatment facility regulations contain provisions through which a facility may request an exception to specific requirements of 28 Pa. Code Part V, including the requirements of 28 Pa. Code § 704.9(c). See, 28 Pa. Code §§ 701.11 – 701.13.

Through this exception process, the Division will consider reducing the length of direct observation requirements set forth in 28 Pa. Code § 704.9(c)(5) for individuals in the counselor assistant position who meet the requirements of 28 Pa. Code § 704.8(a)(5). A facility that has counselor assistants meeting the requirements of 28 Pa. Code § 704.8(a)(5) for whom the facility would like to seek an exception, should file an exception request, which outlines the length of direct observation time the facility intends to provide the counselor assistant.

The Division will not consider exceptions for counselor assistants meeting the requirements of 28 Pa. Code § 704.8(a)(5) who do not have at least six months of prior employment, where direct client contact was a primary job duty, at the project providing residential services that wishes to promote the employee to a counselor assistant. In addition, the counselor assistant meeting the requirements of 28 Pa. Code § 704.8(a)(5) must be a Certified Recovery Specialist (CRS) or have a minimum of 54 hours of Continuing Education Units (CEU) (to include 6 hours of confidentiality, 6 hours of professional ethics and 42 hours of other topics in counseling theory and techniques) for consideration by the Division. Lastly, the Division will not consider exceptions for counselor assistants who are not actively pursuing promotion to the position of counselor pursuant to 28 Pa. Code § 704.10.

In the event that the full time direct observation is reduced, the supervisor is to continue close supervision requirements as outlined in 28 Pa. Code § 704.9(c)(5). Further, as required by 28 Pa. Code § 704.8(c), assignment of a full caseload is contingent upon the supervisor's positive

assessment of the counselor assistant's individual skill level. If at the end of the reduced period of direct observation, the counselor is not yet competent to practice independently or perform all duties in the job description, direct observation and/or additional close supervision time is to continue in the intensity and duration needed to establish baseline skills. At all times, the clinical supervisor retains responsibility of for the actions of the supervisee.

A facility shall immediately notify the Division if a counselor assistant for whom the facility was granted an exception pursuant to this Licensing Alert discontinues pursuing a promotion to the position of counselor pursuant to 28 Pa. Code § 704.10. Discontinuing pursuit of counselor will be considered justifiable reason for revocation of the exception pursuant to 28 Pa. Code § 701.12.

Exceptions may be submitted following the procedure outlined in 28 Pa. Code § 701.11 and Licensing Alert 4-97, and should include the facility's supervision plan and documentation of the counselor assistant's CRS or CEU training and pursuit of promotion pursuant to 28 Pa. Code § 704.10. The reduced length of direct supervision proposed in a facility's exception request may not begin prior to the exception being granted.

Questions regarding this Information Bulletin may be directed to the Division of Drug and Alcohol Program Licensure at 717-783-8675.

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