Substance Use Disorder Compliance Unit Guidance Letter

<table>
<thead>
<tr>
<th>Number: GL 19-3001-A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title: Qualified Credentialed Counselor (QCC) Guidance Letter</td>
</tr>
<tr>
<td>Provider Types: Chemical Dependency Treatment Facilities (CDTFs)</td>
</tr>
<tr>
<td>Date Issued: June 8, 2020</td>
</tr>
</tbody>
</table>

1.0 Subject and Purpose

This amended guidance letter replaces GL 19-3001, issued on June 5, 2020 to clarify a Licensed Chemical Dependency Counselor is also able to fill the QCC role and provide clinical supervision of an LMSW providing clinical services.

The Texas Health and Human Services Commission (HHSC) provides guidance to licensed CDTFs. This letter provides instruction to CDTFs regarding licensure qualifications required for the QCC role.

This letter outlines provider responsibilities and expectations.

2.0 Policy Details & Provider Responsibilities

A CDTF licensed under Texas Health and Safety Code, Chapter 464 is required to comply with HHSC rules.¹

HHSC rule defines the terms clinical social work, board-approved supervisor, and supervision.²

A QCC is professionally responsible for the oversight of clinical work and documentation on behalf of a facility. The QCC reviews the clinical work

¹ Health and Safety Code, Title 6, Chapter 464.
² Texas Administrative Code, Title 22 (22 TAC) §871.102(12), (56), and (57).
documentation performed by a supervisee or intern and provides a signature affirming review and supervision requirements were fulfilled. Under current Board of Social Worker Examiners (BSWE) rule, a Licensed Master Social Worker (LMSW) may practice clinical social work in an agency employment setting while under clinical supervision.\(^3\) A Licensed Professional Counselor (LPC), Licensed Psychologist (LP), Licensed Marriage and Family Therapist (LMFT), Licensed Chemical Dependency Counselor (LCDC), Licensed Clinical Social Worker (LCSW), or Psychiatrist may fill the QCC role and provide clinical supervision of an LMSW providing clinical services.\(^4\)

HHSC is updating the CDTF rules to reflect the clinical social work requirements set forth by the BSWE.

### 3.0 Background/History

There has been confusion regarding the LMSW’s scope of practice when working in CDTF settings.

### 4.0 Resources


To receive future updates, sign up for GovDelivery at [https://service.govdelivery.com/accounts/TXHHSC/subscriber/new](https://service.govdelivery.com/accounts/TXHHSC/subscriber/new).

### 5.0 Contact Information

If you have any questions about this letter, please contact the Policy, Rules, and Training unit by email at: [HCQ_PRT@hhsc.state.tx.us](mailto:HCQ_PRT@hhsc.state.tx.us).

---

\(^3\) 22 TAC §781.202(c).
\(^4\) 22 TAC §781.404(a)(2).