On behalf of the Board of Directors – Oklahoma State Board of Licensed Social Workers

As the Coronavirus Disease 2019 (COVID-19) situation continues to develop in Oklahoma, state leaders have been working to put plans in place to ensure Oklahomans are protected. The Oklahoma State Board of Licensed Social Workers (OSBLSW) is committed to service and safety for all Oklahomans, including the safety of those served by the OSBLSW (our licensees).

Over the last few days, there have been many questions presented to the OSBLSW in terms of the agency’s stance and response to COVID-19. I’ve tried to categorize the questions into main talking points which will hopefully address any noted concerns. Please note we do see this as being very fluid and subject to change based on future recommendations at the National and State Level.

1) Telehealth regulations:

There are no rules, regulations, or statutory requirements that prohibit social workers from providing services electronically. Some things to take into consideration should you move forward with providing social work services via an electronic platform:

- **HIPAA rules remain in effect.** It is incumbent upon the practitioner to observe all HIPAA requirements and to protect the health information of their client systems, no differently than face-to-face interactions.
  - This includes storage of information such as assessments, progress notes, treatment plans, etc. It is entirely the responsibility of the practitioner to ensure the confidentiality of the client system is protected, regardless of how the service is being offered.
  - If you work within an agency setting and are planning to work off-site, have a discussion with them about setting up VPN access to your agency computer system. This would allow you to work off-site and still enter information through a secure platform.
  - The OSBLSW does not maintain a list of approved electronic platforms for tele-therapy, but this an acceptable form of practice. The practitioner should research available platforms and use the one they are comfortable with and that allows you to remain HIPAA compliant.

- **Consult with your payer systems.** While tele-therapy is an acceptable and legal form of practice, practitioners/agencies should be consulting with their payer systems for a determination of compensability should this form of practice be used. Not all payer systems provide reimbursement for tele-therapy services.

- **Consult with other jurisdictions.** If you are considering providing tele-therapy services to a non-resident of Oklahoma (example, a college student you were providing services to returned to their home state because their University in Oklahoma closed their doors), check with that jurisdiction for a determination of whether or not you need to be licensed in that jurisdiction. The requirement on this varies from jurisdiction to jurisdiction.

- **Best Practice – Technology Standards.** Attached to this communication is a document prepared by ASWB and NASW. The document includes information about the standards for use of technology and social work practice and is considered to be “best practice”.

2) Continuing Education Units for Calendar Year 2020:

Please know the OSBLSW does recognize the significance of the COVID-19 event and its potential impact for social workers to meet their continuing education requirements as per agency policy this year. At this early point in the licensure cycle, it's still very unclear as to the length of the event. As such, the OSBLSW is not offering any adjustments to the CE requirements AT THIS TIME.

If it becomes clear the COVID-19 pandemic remains a serious health concern moving into the summer months and it appears in-person CE events will continue to be challenging to secure, as well as, discouraged, the OSBLSW will certainly re-evaluate the need to adjust the requirements. An announcement will be made no later than July 31st, 2020 regarding any modifications to the CE requirements.

Please note that our agency rules DO allow for all CE events to be acquired online, even prior to the development of the COVID-19 pandemic. There are many online providers who currently offer “live webinars” and are approved through ASWB or NASW. As per agency rule 675:15-1-3(b)(1), live webinars count as Category I learning events (face to face). Additionally, there seems to be some confusion about the three (3) hour ethics requirement. The ethics hours DO NOT have to be obtained as Category I (face-to-face). The agency rule states that all licensees are required to obtain 16 hours of CE Credit, with a minimum of 8 of those 16 hours being Category I. Ethics can be obtained as part of your Category I OR Category III learning event.

Some online providers offering live webinars approved through ASWB and NASW National include:

- www.Inrseminars.com
- www.Pesi.com
- www.Tzkseminars.com

3) Clinical Supervision – Electronic Supervision:

Effective immediately, the OSBLSW is offering blanket approval for the use of electronic supervision for those currently under supervision for clinical licensure, administrative licensure, or the advanced generalist licensure. This blanket approval will remain in effect through July 31st, 2020. It is the responsibility of the Supervisor and Supervisee to assure confidentiality of client system information and that health information is protected. The electronic platform will be determined and agreed to between the Supervisor and Supervisee, e.g., video through FB Messenger, face-time, SKYPE, videoconferencing, etc. The supervisor and supervisee should consider the setting at their respective locations so the supervision consultation remains private and without distraction. Due to the lack of security for many of the available electronic platforms, the use of client specific information during the supervisory consultation, e.g., name, DOB, etc. is PROHIBITED. The OSBLSW is simply offering a reminder that the quality of the supervisory experience is predicated on the “clinical issue”, not the demographics of the client system.
4) **Board Meeting Cancellation:**
With the new recommendations of the WHO and the board room at the Board of Medical Licensure and Supervision not being available, the OSBLSW is cancelling the March 2020 Board Meeting. Excluding applications that would have required a personal appearance for approval, the OSBLSW is working on a resolution to process applications that were scheduled to be approved at the March Board Meeting. The OSBLSW will keep our licensees and applicants informed of any changes to future Board Meetings.

5) **Supervisor Training Cancellation:**

The Board Approved Supervisor Training scheduled for April 3rd, 2020 has been cancelled. The OSBLSW will remain flexible with Supervisors and extend training due dates so supervisory status is not lapsed.

6) **ASWB Exam Testing and Pearson Vue:**

The OSBLSW received notification late last night that Pearson VUE has suspended test delivery until April 16th, 2020. The OSBLSW will work with individuals on a case by case basis to extend testing due dates for those impacted. For those who have their test scheduled between now and April 16th, ASWB will work with you on re-scheduling and it is my understanding they will be waiving the change fees. If you need to cancel your testing appointment with less than 24 hours’ notice, you must do so by calling Pearson VUE directly. No cancellations can be made online less than 24 hours before a scheduled appointment.

7) **Recommendations from CDC/WHO/OK State Department of Health, etc.:**

The Centers for Disease Control and Prevention (CDC) and Oklahoma State Department of Health (OSDH) recommend routine hand hygiene, cough and sneeze etiquette, staying home when you are sick and routine cleaning as a first line of defense to prevent the spread of all illnesses, but particularly COVID-19. Below are some specific strategies that should be considered for implementation to prevent the spread of illness:

- Stay home when you are sick and try to avoid contact with sick people, whenever possible.
- Keep in regular contact with your employer when you are ill or caring for a sick family member.
- Practice cough and sneeze etiquette. Cover your mouth and nose with a tissue when you cough or sneeze, and then place the used tissue into the trash. If you don’t have a tissue, cough or sneeze into your elbow or shoulder rather than your hand.
- Avoid touching your face, specifically your eyes, nose and mouth.
- Keep your hands clean by washing or sanitizing them often, particularly after coughing or sneezing or being around someone who is sick. Wash your hands with soap and warm water for at least 20 seconds, or about the time it takes to sing the “Happy Birthday” song twice. Though soap and water are always preferred, an alcohol-based hand sanitizer that contains at least 60-95% alcohol is also effective in cleaning hands that are not visibly dirty.
- Routinely clean frequently touched surfaces in your workspace and common areas using sanitizing surface wipes or approved cleaners. Follow the directions on the label of the cleaner to ensure safe and effective cleaning.
- Practice Social Distancing – the most recent recommendations from the World Health Organization (WHO) is to avoid group of people that exceed ten (10) individuals. This would include training, meetings, etc. In addition, try to maintain healthy boundaries with those who may be at higher risk of illness, e.g., 6 ft.
- Share and post the [CDC’s educational posters](https://www.cdc.gov) where they can be easily seen by staff and customers.
- Check the [CDC’s website](https://www.cdc.gov) before embarking on international travel for the latest guidance and recommendations for each country to which you will travel.
- Follow the [CDC](https://www.cdc.gov) and [OSDH](https://www.osdh.ok.gov) websites and social media for the latest information on COVID-19 and other health-related matters.
- You may also contact the COVID-19 Call Center operated by the Oklahoma State Department of Health at 877-215-8336. Call Center Hours are 9 a.m. to 7 p.m., Monday – Friday and 9 a.m. to 3 p.m., Saturday. The Call Center has the capability to connect callers to Spanish speaking interpreters.

The OSBLSW is truly thankful for all our licensees and your impact on Oklahoma’s most vulnerable populations. We do ask that you be patient with our office moving forward. This document and future updates will be posted to the agency website as they become available. As always, please don’t hesitate to contact myself or Jinna Dreessen with any additional questions.

Kind regards and please remain safe,

James M. Marks, LCSW
Executive Director
Oklahoma State Board of Licensed Social Workers