

## Professional Licensing Waiver (PLW) Instructions and Resources

### Waiver Eligibility and Purpose

PLWs are required for persons employed or under contract or subcontract with the mental health plan (MHP) to provide mental health services as:

- Psychologists who have earned a doctorate degree or are enrolled in a doctorate program and have completed a minimum of 48 semester/trimester or 72 quarter units of graduate coursework in psychology (not including thesis, internship or dissertation)
- Psychologist, clinical social worker, marriage and family therapist, or professional clinical counselor who have been recruited for employment from outside of the state of California and whose experience is sufficient to gain admission to the applicable California licensing examination<sup>1</sup>.

An In-State Waiver for persons with, or in the process of obtaining, a Psy.D. or Ph.D. allows them to be employed for up to five years for the purpose of accruing the supervised professional experience required to sit for the licensing examination.

Individuals actively enrolled in relevant post-secondary programs are not required to apply for PLWs and may perform activities with the scope of practice of their discipline as a Clinical Trainee. For more information about Clinical Trainees, refer to [1603-3-3 ACBHD Clinical Trainee Policy](#).

### Waiver Duration

- PLWs granted by DHCS are valid for five (5) years from the first date of employment by, or contract or subcontract with, a local mental health program or MHP.
- PLWs cannot be extended beyond this five (5) year timeframe and must run continuously from the start date.
- The five (5) year term may not be backdated, postponed, paused, deferred, or extended for any reason.

ACBHD does not recommend Ph.D. or Psy.D. students apply for a PLW until they have completed their program, or completion is imminent.

All individuals seeking a PLWs who are actively enrolled in post-secondary degree programs must sign an ACBHD acknowledgment and consent form, attesting that they have been informed of the 5-year limitation of a PLW and the risks of applying for a PLW while still enrolled in their degree program.

### Agency Responsibilities

Employers should begin the waiver application process prior to the employment start date for persons seeking employment as newly waived clinicians or clinicians with a change of employment. If the change of employment is within the same MHP or county network, a new application is not needed. There is a five-year time frame for the waiver, regardless of employment changes.

When hiring a waived clinician, agencies must verify the status of existing waivers at the onset of employment.

Employers are responsible for ensuring that all personnel, including those who require a waiver, do not perform duties outside of their scope of practice. See scope of practice guidance in Section 12 of the [QA Manual](#).

### Application Process

Waiver applications are submitted by employers on behalf of their employees to ACBHD Quality Assurance (QA) Division, using the following process:

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<sup>1</sup> Out-of-state applicants are required to follow the rules and regulations of the respective credentialing board (e.g. [CA BBS](#), [CA Board of Psychology](#))



1. Using the [DHCS Instructions](#), complete sections A-C, then D, E, or F as applicable of the [DHCS 1739: Mental Health \(MH\) Professional Licensing Waiver Request](#).
2. Gather supporting documents for persons seeking an initial waiver:
  - a. For Psychologists who have earned a doctorate degree or are enrolled in a doctorate program and have completed a minimum of 48 semester/trimester or 72 quarter units of graduate coursework in psychology (not including thesis, internship or dissertation):
    - i. An unofficial or official college transcript from the institution's registrar's office with an issuance date within 30 days of request.
  - b. For Psychologists, clinical social workers, marriage and family therapists, or professional clinical counselors who have been recruited for employment from outside of California, are employed or under contract or subcontract with the MHP to provide mental health services, and whose experience is sufficient to gain admission to the appropriate California licensing examination for their profession:
    - i. Evidence of the issued license that includes the individual's full name, license number, and name of the state they are licensed in.
    - ii. Evidence from the appropriate California licensing board that the individual has been accepted to sit for the applicable California licensing exam for their profession. A copy of the email from the licensing board confirming the individual's licensing exam date is sufficient to meet this requirement.
3. Submit the completed PLW application to ACBHD QA Office, by either:
  - a. Email: [QAOffice@acgov.org](mailto:QAOffice@acgov.org)
  - b. Fax: 510-639-1346
  - c. Mail:

Alameda County Behavioral Health Department  
Quality Assurance Office  
2000 Embarcadero, Suite 400  
Oakland, CA 94606

### **ACBHD Responsibilities**

- The ACBHD QA Division is responsible for reviewing the PLW applications and submitting them to the California Department of Health Care Services (DHCS) on behalf of the agency/applicant.
- The QA office communicates with the provider if there are issues.
- The process generally takes 30 days to complete.
- Once completed, QA will send a copy of the waiver response from the State to the employer.
- The QA office tracks and maintains records of all waiver activity.
- For questions, contact [QAOffice@acgov.org](mailto:QAOffice@acgov.org).

### **Resources**

- [DHCS PLWs webpage](#)
- [ACBHD Mental Health Professional Licensure Waiver Policy](#)
- [BHIN 24-033](#)
- [For DHCS PLW Application Instructions, see DHCS Form 1739](#)