



STATE OF ARIZONA
BOARD OF BEHAVIORAL HEALTH EXAMINERS
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DOUGLAS A. DUCEY
Governor

TOBI ZAVALA
Executive Director

October 22, 2018

Jennifer Woodson
[REDACTED]

Dear Ms. Woodson:

On August 3, 2018, the Arizona Board of Behavioral Health Examiners ("Board") reviewed your application for licensure as a licensed clinical social worker and determined that you are not eligible for licensure pursuant to A.R.S. § 32-3275(6). Specifically, the Board found that you engaged in conduct that had you been licensed would have constituted grounds for disciplinary action. The Board determined that the disciplinary action invoked the following violations that were based upon the conduct referenced thereafter:

1. A.R.S § 32-3251(16)(l), engaging in any conduct, practice or condition that impairs the ability of the licensee to safely and competently practice the licensee's profession.
2. A.R.S § 32-3251(16)(c)(i), making any oral or written misrepresentation of a fact to secure or attempt to secure the issuance or renewal of a license.

These violations were based on the following findings:

1. In 12/17, Jennifer Woodson ("Applicant") submitted her LCSW application to the Board.
2. In support of her application, Applicant and her two clinical supervisors ("J.M. and A.S.") provided verification forms to the Board.
3. J.M. declared that he and Applicant completed 161 hours of clinical supervision between the dates of 04/12 – 08/17.
4. A.S. declared that she and Applicant completed 53 hours of clinical supervision between the dates of 02/15 – 08/17.
5. Upon review of the clinical supervision records that Applicant and her supervisors maintained, there were numerous discrepancies identified, including the following:
 - a. In review of Applicant and J.M.'s clinical supervision records, there are only 35 verifiable hours, as opposed to the 161 hours claimed.
 - b. In review of Applicant and A.S.'s clinical supervision records, there are only 46.5 verifiable hours, as opposed to the 53 hours claimed.
 - c. For certain years, 2012 and 2017, although clinical supervision was claimed to have occurred, there is no evidence or record that supervision took place.
 - d. R4-6-212(C)(4) requires that clinical supervision notes are written contemporaneously by the clinical supervisor.
 - e. Applicant acknowledges that she wrote all of the supervision notes, rather than J.M. or A.S.

- f. Applicant also acknowledges that she created the supervision notes months or years after the fact.
 - g. However, Applicant failed to date her signature on each of her notes, which makes it impossible to know when the notes were created.
 - h. Several supervision notes dated between the years of 2014 – 2016 were signed off by J.M. on 02/09/18, which is nearly 4 years after the fact.
 - i. Not all of the supervision notes contain a supervisor's signature, as required.
 - j. None of A.S.'s signatures contain the date she signed.
 - k. Some of the supervision notes contain signatures from both J.S. and A.S. when both were not present during supervision.
 - l. Several supervision notes contain identical dates and times, while containing different content.
 - m. In one instance, a supervision note contains a session date at the top of the note, while the content of the note makes reference to a different date.
6. In response to these issues, Applicant indicated the following through her written response and investigative interview:
- a. The absence of notes in 2013 was due to Applicant's decision to use other notes in 2015 and 2016.
 - b. Their agency has gone almost completely paperless and uses an electronic system.
 - c. She knew that the notes needed to be signed, but not that the signatures needed to be dated.
 - d. Applicant incorrectly assumed that the system would enter a date next to her signature, but she understands that there's no way for the Board to see when she actually entered the note.
 - e. Applicant understands that a few of her supervision notes had the same time listed and that was a clerical error she made.
 - f. Applicant created all of the notes.
 - g. Applicant would take handwritten notes for each supervision session and then transfer the information to the electronic system.
 - h. Once Applicant typed up the information, she would throw away her handwritten note.
 - i. When asked how long after the session did Applicant complete the electronic note, she indicated, "I couldn't even say, they're late. They're late, yea. I just knew that they were piling up, and I knew that I had to get them in the system but the more they piled up, the more I put it off."
 - j. When asked why many of the notes signed by J.M. were signed several months or years after the session date, Applicant indicated it is because she created the notes very late.
 - k. When the Board requested the notes earlier this year, Applicant printed all of them out, and realized that she never had A.S. sign the notes at the time so she brought the specific notes to A.S. for her handwritten signature.
 - l. When asked why there are several individual supervision notes, specifically with J.M., that have the same date/time yet different content, Applicant indicate she is not sure how that happened and does not have an explanation.
 - m. Applicant has no excuse for not getting these notes done and understands why the Board is concerned.
 - n. "My documentation is a mess."
 - o. Applicant takes fully responsibility for what happened as it's her license.
7. When considering the numerous issues associated with Applicant's supervision records, including duplicate dates and times, the vast discrepancy between the number of hours claimed and the number of hours verified, as well as the absence of any original documentation and Applicant's acknowledgement of creating notes months or years after the fact, there appears to be no viable way to verify that clinical supervision actually occurred on the dates and times presented to the Board.


In addition, pursuant to A.R.S. § 32-3293, the Social Work Academic Review Committee determined that you did not establish qualifications for licensure based on the following:

1. You did not establish that you meet the supervised work experience as set forth in A.A.C. R4-6-403.
2. You did not establish that you meet the clinical supervision requirements as set forth in A.A.C. R4-6-404.

Per A.R.S. §41.1092.03.B, you may request a Formal Hearing by notifying the agency in writing within thirty-five (35) days from the date of this letter. If you do request a Formal Hearing, you also have the right, pursuant to A.R.S. §41-1092.06, to request a settlement conference. If you do not request a Formal Hearing by the close of business on November 26, 2018, your file will be closed without further recourse to appeal and the licensure denial will be reported to the federal data banks that record this information. If you desire licensure at a later date, you must submit a new application and fee. PLEASE BE FURTHER ADVISED that, pursuant to the Board's licensure statute, as of July 1, 2004, only persons holding licenses to practice counseling may do so unless they are exempt from licensure pursuant to A.R.S. § 32-3271.

If you have any questions, I can be reached at (602) 542-1617.

Sincerely,


Tobi Zavala
Executive Director