



Montana Board of Behavioral Health

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Candidate and Peer Support Supervision Frequently Asked Questions (FAQ)

(Updated 9/9/26)

General Information

Due to the high volume of questions regarding supervision, this FAQ is specifically for questions pertaining to supervisor qualifications and supervision of candidates, certified behavioral health peer support specialists (CBHPSS), and certified family peer support specialists (CFPSS). Visit the board's *General FAQ* also posted to the board's website for more general information on licensing under this board.

You can access all the board's administrative rules pertaining to supervision and/or supervised work experience on the board website under the *Regulations* menu or through the below links. All licensees are responsible for knowing and adhering to all current board statutes and rules pertaining to their practice.

Supervisor Qualifications, Recordkeeping, Etc. Requirements for all candidate license types, CBHPSS, and CFPSS

- [ARM 24.219.421](#) - Supervisor Qualifications
- [ARM 24.219.422](#) - General Supervision and Recordkeeping Requirements

Requirements for post-degree supervised work experience for licensed candidates

- [ARM 24.219.504](#) - LCSW, LMSW, and LBSW Supervised Work Experience Requirements
- [ARM 24.219.604](#) - LCPC Supervised Work Experience Requirements
- [ARM 24.219.704](#) - LMFT Supervised Work Experience Requirements
- [ARM 24.219.5008](#) and [24.219.5010](#) - LAC Supervised Work Experience Requirements & Qualified Treatment Programs

Peer Support Supervision

- [ARM 24.219.907](#) - CBHPSS and CFPSS Supervision Requirements

Supervisors and supervisees should also reference their scopes of practice as defined by the Legislature in [37-39-102, MCA](#). Supervisors are accountable for appropriate supervision of candidates and peer support specialists under [ARM 24.219.2301](#)(2)(h) which is the board's unprofessional conduct rule.

General Supervision

Question: Do all candidates and peer support specialists need to be supervised by a qualified supervisor in order to practice?

Yes. No applications for candidate or peer support licenses will be deemed complete until all licensing requirements have been met, including having at least one qualified supervisor of record. Once licensed, any time there is a change in supervisor(s), both the supervisor and supervisee must notify the board within 20 business days of the change in supervision using the board form. This includes adding a new supervisor and/or ending a supervisory relationship. A candidate, CBHPSS, or CFPSS cannot practice without at least one qualified supervisor.

Visit the [board website](#) for the current supervision form.

Question: Can I renew/register my license during annual renewal/registration if I do not have a current supervisor?

Yes. You can complete annual renewal/registration if you do not currently have a supervisor to avoid paying late fees or allowing your license to expire. However, you are not allowed to practice under your candidate or peer support license until you have at least one qualified supervisor of record. See above regarding notifying the board regarding any change in supervision within 20 business days.

See General FAQ for more information regarding annual renewal/candidate registration dates.

Question: Does the board allow both telepractice and telesupervision?

Yes. You are considered to be practicing in Montana if your client is physically located in Montana regardless of your physical location. Telepractice is merely a method of delivery of services under your scope of practice. However, if you are physically located in another state you may want to check with its licensing body regarding its laws as laws vary in other states.

Additionally, in reference to supervision of candidates and peer support specialists the board has certain requirements for face-to-face supervision. However, the board defines "face-to-face" under [ARM 24.219.301\(13\)](#) to include both in-person and synchronous electronic transmissions.

[ARM 24.219.301\(13\)](#): "Face-to-face" means supervision...which is either:

- (a) in-person; or
- (b) electronically. The transmission must:
 - (i) be two-way;
 - (ii) be interactive;
 - (iii) be real-time;
 - (iv) be simultaneous; and
 - (v) provide for both audio and visual interaction."

Question: I have graduated from my degree program but have not yet been licensed as a candidate under the Montana Board of Behavioral Health. Can I begin earning post-degree supervised work experience hours prior to being issued a candidate license?

No. In order to practice legally under state law, once you graduate you must have an active candidate license. Students enrolled in course of study at an accredited institution are exempt from licensure requirements under [37-39-303\(5\)](#), MCA. Once you graduate you are no longer exempt from licensure requirements. This is why we recommend students start the application process at least several months prior to graduation so the majority of the application has already been reviewed prior to final transcripts being issued by the college or university.

Question: I have graduated from my degree program but have not yet been licensed as a candidate under the Montana Board of Behavioral Health. Can I continue to see clients I had been seeing as part of my school internship prior to becoming licensed as a candidate under this board?

No. See above response.

Question: What records do I need to maintain? Does the board have specific templates for tracking

supervision for candidate supervised work experience hours or peer support supervision?

Both supervisors and supervisees are responsible for maintaining separate copies of records of supervision per [ARM 24.219.422](#). This way if there are discrepancies that arise during an audit or as part of a complaint between a supervisor and supervisee, the board may review both sets of records.

The board does not maintain forms or dictate the format of the records maintained by supervisors and supervisees. Any specific requirements pertaining to maintaining records are described in [ARM 24.219.422](#).

Question: I have completed all my post-degree supervised work experience hours as a candidate and passed the licensing exam. Do I need to apply for a "full" license? What proof of my hours do I need to submit?

You must apply for an LCSW, LMSW, LBSW, LCPC, LMFT, or LAC license using the [online application](#) for that type of license. It is not an automatic step up from a candidate license. To apply, log into your existing account and select the option to start a new license application. Remember, all applicants under this board must also obtain an FBI fingerprint background check through the Montana Department of Justice (DOJ) to complete your application. It typically takes 4-6 weeks for background checks results to be sent to us for your application. Visit the [DOJ website](#) for more information on obtaining a background check.

To qualify for an LCSW, LMSW, LBSW, LCPC, LMFT, or LAC license you must have completed the supervised work experience and passed the required licensing exam under [ARM 24.219.403](#). You do not have to submit your supervision records with your application though you must maintain them per [ARM 24.219.422](#). You must submit the department supervised experience attestation form signed by both you and that supervisor. This form is a legal attestation from both you and that supervisor that you obtained [x] hours of supervision.

Staff reviewing your application will review all your supervisor attestation forms to ensure you have met the total required hours in the minimum required areas. If a supervisor does not sign a form then that form is not accepted as proof of completing those hours (see also below).

Candidates who have completed all the required work experience hours and passed the required exam for that profession can continue working under an active candidate license as long as they continue to be supervised by at least one qualified supervisor. Many candidates continue to do this while their application for CSW, LMSW, LBSW, LCPC, LMFT, or LAC is being reviewed. However, you must continue to be supervised and maintain records per the requirements of candidate supervision regulation while you are practicing under that license.

Question: I am a licensed candidate and my supervisor(s)/past supervisor will not attest to my hours. We disagree on the number of hours I have completed under supervision. Can I move forward with applying for my LCSW, LMSW, LBSW, LCPC, LMFT, or LAC if my supervisor(s) will not attest to my hours?

No. Both you and your supervisor must sign the form. When you and the supervisor each sign you are each legally attesting as licensees that the candidate has completed those specific supervised work experience hours under the license specific rule and the general supervision requirements under [ARM 24.219.422](#).

Both candidates and supervisors are required to maintain your own separate sets of records under [ARM](#)

[24.219.422](#). If you believe a supervisor is engaged in unprofessional conduct by not attesting to hours you did obtain based on your records, you can file a complaint with the board. Information the complaint process and how to file a complaint can be found on our [department complaint page](#).

Question: I am a licensed candidate and my supervisor(s)/past supervisor is no longer available to sign the form to attest to my hours due to sudden death, incapacitation, etc. What can I do?

This situation is different than the scenario described above. There is no standard answer to this issue and circumstances vary. Work directly with the license examiner staff member who is reviewing your application to determine possible next steps and documentation needed to prove you completed supervised hours under that person. There is no guarantee, but since both candidates and supervisors are required to maintain your own separate sets of records under [ARM 24.219.422](#) there might be ways for you to produce documentation that would qualify as proof.

Question: What are the board's requirements regarding billing including Medicare, Medicaid, and private insurance?

Laws pertaining to billing, including private insurance and Medicare and Medicaid, are outside this board's jurisdiction and regulatory authority. As a licensee you must comply with state and federal laws that pertain to your scope of practice. However, it is not this board that regulates or set requirements for billing. .

For questions on Medicare and Medicaid contact the [Montana Department of Public Health and Human Services](#). For questions regarding private insurance, contact those companies directly for information on their reimbursement policies.

Question: Does the board regulate my business relationship with my supervisor?

No. The board does not regulate the business aspects of your practice nor any employee/employer relationship you may or may not have with your supervisor(s) or a business that employs you. The board regulates you as an individual under your scope of practice and holds you to the supervised work experience requirements for licensure, regardless of your business/employment relationships(s).

Supervisor Qualifications

Question: What are the qualifications to supervise candidates, CBHPSS, and/or CFPSS? Does the board issue a separate license or endorsement for supervisors in Montana?

All the requirements for a licensee to qualify to supervise the various candidate and peer support specialist license types can be found in [ARM 24.219.421](#).

In addition to specific requirements for particular license types, all individuals who are not currently or had not supervised prior to August 22, 2026 must meet the requirements in [ARM 24.219.421\(2\)](#):

- "...(a) have an active license in good standing in the jurisdiction in which the supervision is occurring;
- (b) have been licensed in their respective disciplines for at least three years, excluding any period of licensure as a candidate; and
- (c) have taken board-approved training consisting of a minimum of one semester credit graduate education focused on supervision or 20 hours of board-approved training in supervision. This training course may not have been taken during the supervisor's graduate program or while licensed as a

candidate and obtaining supervised work experience."

Prior to 8/22/26, individuals who had been licensed less than three years could qualify to supervise if they took a supervisor training course; and anyone licensed at least three years did not have to take a supervisor training course.

The Board of Behavioral Health has determined that training in how to supervise and mentor is specialized and not necessarily gained through work experience as a licensee. Experience as a practicing licensee and training in supervision are both essential qualifiers. Beginning August 22, 2026 and going forward, the board is requiring all supervisors take a board-approved supervisor training course in addition to having been licensed for at least three years unless they have supervised in the past under previous laws.

Question: As of 8/22/26, I am not currently/have not previously supervised a licensed candidate or peer support specialist in Montana. I have been licensed for at least three years in Montana and/or other jurisdictions but have not taken a Montana board approved supervisor training course. Do I qualify to supervise?

No. You will need to take 20 hours of board approved supervisor training to meet the current requirements to supervise. The board maintains a list of board approved supervisor training courses on its website. Once you have taken 20 hours of approved training, submit it along with the signed supervision form(s) for the individual(s) you will be supervising so staff can update your record to reflect you meet supervisor qualifications.

You can find a list of board approved supervision courses on the [website](#).

Question: I am not currently/have not previously supervised a licensed candidate or peer support specialist in Montana prior to 8/22/26. I have been licensed for less than three years Montana and/or other jurisdictions. Do I qualify to supervise if I take 20 hours of board approved supervisor training?

No. See above. Unless you had been supervising in Montana under the board's previous requirements, you will need to be licensed for at least three years excluding candidacy and complete 20 hours of board approved supervisor training to qualify to supervise.