



TEXAS & NEW MEXICO HOSPICE ORGANIZATION

FAQ: Hospice Social Work Supervision and Interns

August 28, 2025

Disclaimer: The answers provided in this document are the result of the Texas and New Mexico Hospice Organization's research and analysis. If you have specific questions on hospice rules and our interpretation, contact the Texas Health and Human Service Commission (HHSC) Regional or State Offices.

For more information regarding social work licensure, contact Texas Behavioral Health Executive Council. You can submit questions to BHEC at: <https://bhec.texas.gov/>

Question: Does a social worker in a hospice with a Bachelor Social Worker (BSW) have to be supervised by a Master Social Worker (MSW)?

Answer: That is a yes and no answer. As outlined under 42 Code of Federal Regulations (CFR) §418.114 (b) (3), State Operations Manual Appendix M - Guidance to Surveyors: Hospice, and 26 Texas Administrative Code (TAC) §558.833: if the BSW was employed with the hospice provider prior to December 2, 2008, then they do not have to be supervised by a MSW. All other BSW's must work under the supervision of a MSW. **Note:** For purposes of this FAQ, hospice social worker will be assumed to be a BSW.

Question: Does the MSW have to be employed by the hospice agency?

Answer: No. As outlined under 42 CFR §418.114 (a) and (b) (3), the hospice agency has the option of employing a MSW or the MSW can be under contract with the hospice agency. (See also and State Operations Manual Appendix M - Guidance to Surveyors: Hospice.)

Question: Does the hospice social worker have to be licensed to practice social work?

Answer: Yes. The states of Texas and New Mexico require social workers to be licensed.

Texas, see SW licensure rules

[http://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=4&ti=22&pt=34&ch=781](http://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=4&ti=22&pt=34&ch=781) and 26 TAC §558.833 and §558.851.

New Mexico SW Licensure rules: <https://www.rld.nm.gov/boards-and-commissions/individual-boards-and-commissions/social-work-examiners/faqs/>.

Question: Do individuals who are licensed as a BSW and then get their MSW have to become licensed as a MSW?

Answer: Yes, the person must be a Licensed Master Social Worker, if the person wishes:

- to practice Master's Social Work;
- represent himself or herself as a Master Social Worker; or
- use a title that implies licensure in social work.

For information on all rules and statutes that apply to social workers, go to: <https://bhec.texas.gov/wp-content/uploads/2025/08/SW-Rulebook-2025-July.pdf>.

Question: If yes, are MSW's required to take the test to become a LMSW?

Answer: Yes, an applicant for LMSW must pass the Association of Social Work Boards' (ASWB's) Master's exam to obtain LMSW. More information, including requirements for exam eligibility, is available at:

Texas Behavioral Health Executive Council and Texas State Board of Social Work Examiners Rules:

<https://bhec.texas.gov/wp-content/uploads/2025/08/SW-Rulebook-2025-July.pdf>

Texas Occupations Code: <https://statutes.capitol.texas.gov/Docs/OC/htm/OC.505.htm>.

Question: What organizations offer prep courses for the exams? I do know that the National Association of Social Workers and the University of Texas at Austin offer prep courses for the exams. Are there any others across the state that you know of?

Answer: You might find valuable information and resources at: <http://www.aswb.org/exam-candidates/>.

Question: How often does the MSW supervision have to occur?

Answer: The two social workers determine how often they will meet. This information is documented and maintained in the hospice social worker's personnel record. It is optional for the hospice agency to have a policy on the MSW supervision. Always remember that if you have a policy, you are complying with your own policy.

Question: Can supervision occur over the phone or must it be face to face?

Answer: Supervision can be either. The social workers will want to ensure that the supervision is documented.

Question: How should the supervision be documented?

Answer: The supervision can be documented via email, official notes etc. The hospice would want to ensure that there is evidence that the supervision took place.

Question: Where are the supervisory notes kept?

Answer: Where notes are kept would depend on the type of supervision that took place. For example, if they discussed a specific recipient's care, care plan, change in condition, etc, then it would stand to reason that the supervisory notes would be maintained in the recipient's clinical record. If the supervision was not related to a recipient, perhaps more pertinent to the social worker, then the documentation would be kept in the hospice social worker's personnel record.

Question: Where does the physician supervision fit into this equation?

Answer: The physician is responsible for directing the total functions and program for the recipient. The physician leads the direction of care which is coordinated by the nurse for the Interdisciplinary team (IDT). The physician's input and approval of the plan of care should satisfy the requirement for physician direction. The MSW supervision is in essence the supervisor for the social work services performed by the hospice social worker who addresses the needs of the recipient and family. (See 42 CFR §418.56 (a) (1), §418.64 (c) and State Operations Manual Appendix M - Guidance to Surveyors: Hospice.)

Question: Can my agency use social work (SW) interns for specific SW tasks? Can the SW intern document the tasks performed in the records under the supervision and guidance of a Master Social Worker (MSW)?

Answer: A hospice agency that mentors and uses unlicensed social work interns must have policies and procedures to address the supervision and limitations of the unlicensed person. In 26 TAC §558.833 relating to Hospice Medical Social Services, it states that medical social services must be provided to a client by a qualified social worker and the requirements to be considered qualified are active licensure in the state of Texas as a master social worker (MSW) and one year of social work experience in a health care setting; or active licensure in the state of Texas as a baccalaureate social worker, one year of social work experience in a health care setting. That intern would be considered unlicensed and would not be able to perform the duties of a social worker independently in the hospice agency. That would include independent assessments and documentation in the client's record to satisfy required medical social

services. The agencies policies must include a plan for supervision of the unlicensed person and appropriate documentation by the Master's prepared social worker.

The agency's volunteer program should address the use of both unlicensed and licensed volunteers. See also TNMHO's FAQ: [Using Interns as Volunteers in Hospice](#) at our Members Only page.

If you use or are considering the use of SW interns, reach out to your regional surveyor to ensure systems are in place.

Question: If the plan of supervision includes that the student will make contact with the patient, consult with the social worker for direction and document with the social worker reviewing and co-signing, does this meet the intent of the Texas Administrative Code? Does "independently" mean they cannot make contact with the patient without the "presence" of the social worker or does it mean that the student, under the supervision of the social worker, can make the contact and consult with the social worker to ensure appropriate services are being offered?

Answer: It is up to the agency to determine what is appropriate for an unlicensed intern or volunteer to do under the clinical and non-clinical supervision of the MSW and ensure that it is in accordance with the practice act of that profession. Title 22 Part 34 of the Texas State Board of Social Worker Examiners, Chapter 781, Subchapter C, provides regulations regarding clinical and non-clinical supervision in a social work setting. Go to: <https://bhec.texas.gov/wp-content/uploads/2025/08/SW-Rulebook-2025-July.pdf>.

Question: Can you give examples of what "can" be done by social worker interns?

Answer: The rules are silent on a list of tasks that an intern or volunteer may do but the agency should take into account their policies and procedures, their own supervision plans, and the needs of their clients. An agency may also consider working directly with the intern's social work program to find guidance as to what tasks can be done under the supervision of the MSW.

Additional References:

- Community Services: <https://www.hhs.texas.gov/about/contact-us/community-services-regional-contacts>
- Regulatory Regional Contact: <https://www.hhs.texas.gov/about/contact-us/long-term-care-regulatory-regional-contact-numbers>
- HHSC regional map is located at: <https://www.hhs.texas.gov/sites/default/files/documents/about-hhs/hhs-regional-map.pdf>
- State Operations Manual Appendix M - Guidance to Surveyors: Hospice: https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/som107ap_m_hospice.pdf
- 42 Code of Federal Regulations Chapter 418 Hospice Care: <https://www.govinfo.gov/app/details/CFR-2011-title42-vol3/CFR-2011-title42-vol3-part418>
- 26 Texas Administrative Code Chapter 558 Licensing Standards for Home and Community Support Services Agencies: https://texas-sos.appianportalsgov.com/rules-and-meetings?chapter=558&interface=VIEW_TAC&part=1&title=26