

## N.C. Social Work Certification and Licensure Board

### **POSITION STATEMENT ON TECHNOLOGY FACILITATED SERVICES**

#### **Purpose:**

Pursuant to [N.C. Gen. Stat. § 90B-2](#), it is the purpose of the North Carolina Social Work Certification and Licensure Board (hereafter Board) to protect the public by setting standards for qualification, training, and experience for those who seek to represent themselves to the public as certified social workers or licensed clinical social workers and by promoting high standards of professional performance for those engaged in the practice of social work. While the Board strongly encourages in-person interactions, we recognize that advancement in technology has impacted social work practice both in the delivery of services and obtaining information.

As the definition of general social work practice and clinical social work practice in North Carolina includes the phrase “by whatever means of communications,” it is the position of the Board that technology facilitated services are one of several means of providing professional services, and as such, remain fully subject to the statutes and rules governing social work practice as outlined in [N.C.G.S. § 90B](#) and [Title 21, Chapter 63 of the NC Administrative Code](#).

North Carolina practitioners are reminded that pursuant to [NCAC 63 .0211](#), appropriate supervision of associate licensees (LCSWA) providing clinical social work services to satisfy the requirements for LCSW, and those seeking certification as a Certified Social Work Manager (CSWM), allows for no more than 50 hours of supervision provided through the use of technology. The remaining supervision requirements must be satisfied by meeting face-to-face, in person with the appropriate supervisor, unless otherwise preapproved by the Board. The Board does ***NOT*** consider delivery of supervision via telemed, webcasting, skype or other similar audio/video broadcast to be acceptable in satisfying the requirement for “in person” supervision. Further, all supervision provided through the use of technology shall be synchronous, involve visual and audio interactions throughout the entire session, and shall take place in such a manner as to maintain the confidentiality of the communication.

Technology facilitated services (e.g. technology assisted services between participants in different locations ) are increasingly used in meeting professional social work functions, including clinical and supervisory interactions. The purpose of this position statement is to clearly define the standards of expectation the Board has for social workers with regard to the use of technology facilitated services in professional social work practice, including supervision and the delivery of social work services to consumers. While this applies to more mature technologies such as telephone and facsimiles, this position statement expands to address the use of recent and emerging technologies, such as telepractice, electronic therapy, distance therapy, electronic supervision, Web-conferencing, Video-conferencing, Webcasts, etc.

## Practitioner Responsibility:

Social Workers are ethically obligated to understand, adhere to, and stay current on changes to the use of technology. Social Workers must adhere to professional ethics, standards, statutes, and rules in regards to the use of technology in Social Work practice.

Use of technology refers to, but is not limited to text, email, phone, social media, apps (including those that implement and offer artificial intelligence (“AI”)), and telehealth to deliver social work services. A certified or licensed social worker who uses these means to provide services shall abide by the provisions set forth in the [Social Worker Certification and Licensure Act \[N.C.G.S. § 90B\]](#) and [Title 21, Chapter 63 of the N.C. Administrative Code](#). It is the social worker’s responsibility to ensure that professional and ethical standards are upheld, and the following practice considerations are addressed:

1. Some highlights include, but are not limited to, adherence with the following:
  - a. **Informed Consent:** Remember that the use of technology, including specific use and risks of each type of technology, should be incorporated as a part of informed consent [[21 NCAC 63 .0504\(b\)\(c\)\(f\)](#)]. When utilizing technology and/or transcription tools, social workers should know where transcriptions are stored, how securely transcriptions are stored, who has access to the transcriptions, and who owns the transcription data.
  - b. **Client Confidentiality:** Remember there are potential risks to consider when using technology, such as use of your personal phone and need for specified encryption, such as for telehealth. Remember the importance of protecting client confidentiality in regards to texts/emails [[21 NCAC 63 .0507\(a\)\(e\)](#)]; as well as social media/text communication with colleagues, employees, supervisees and collateral contacts [[21 NCAC 63 .0505](#)]. Be mindful in your use of generative AI systems, as such apps may allow for others to access and use information that you enter into such apps. Avoid technology that may allow for unauthorized disclosure of your client’s protected health information.
  - c. **Competence:** Remember that social workers have a responsibility to complete training, seek supervision, and develop competence prior to use of technology, including incorporating the use of apps in social work practice. [[21 NCAC 63 .0503](#)] Do not rely on the information provided by AI-driven apps without reviewing the substance carefully, as you are ultimately responsible for the clinical treatment and services provided to your clients.
  - d. **Professional Boundaries:** Remember the social worker’s role and responsibility to set appropriate boundaries when using technology, such as use of social media for personal and professional use and appreciation of the potential intersection between the two. Remember that even if the client violates the boundaries, it is the social workers responsibility to uphold the standards of practice. [[21 NCAC 63. 0504](#)]

**Compliance with laws impacting the practice of social work:** Many technologies require the execution of an agreement or legal document to ensure that the information is stored on a HIPAA compliant server. Social workers should understand the data security and data ownership of any AI tool that will contain or include protected health data. Additionally, social workers should

ensure that their systems have adequate data security. It is recommended that social workers take a human-in-the-loop approach to using AI software.

2. Accurate representation of social work practitioner and services offered:
  - a. Credential type and number is identified for each state where credentialed
  - b. Specify nature and extent of services offered
  - c. Location of practice
  - d. Practitioner's contact information for use in case of technology failure
  - e. Emergency contact information for practitioner and client
  - f. Contact information for the regulatory boards from which the practitioner is credentialed
3. Compliance with regulatory/licensure requirements for the jurisdiction in which the social worker provides services *as well as* the jurisdiction in which the client receives services.
4. Knowledge of professional liability requirements/limitations to include annual digital security training of staff and data/cyber liability insurance.
5. Clinical Competence:
  - a. Safe, ethical, and appropriate use of technology facilitated services for the specific need, to ensure the use of the most appropriate intervention modality.
  - b. Crisis plan.
  - c. Provider's cultural, clinical and technological competence, to include assessment of the client's needs, willingness and ability to engage in technology facilitated services.
  - d. Awareness and assessment of non-verbal/non-written behavior.
  - e. Setting and review of goals, intervention modalities and schedules .
  - f. Any expectation for face-to-face contact .
6. Augmented Informed Consent to address the additional risks associated with services rendered through the use of technology.
7. Confidentiality:
  - a. Clear identification of what is confidential and the limits of confidentiality.
  - b. Knowledge of and adherence to HIPAA requirements, federal, State and local laws impacting the practice of social work.
  - c. Documentation adequate to provide proper diagnosis and treatment and to fulfill professional responsibilities.
  - d. Security of confidential information transmitted and stored, including security software, potential risks, ethical considerations, data record storage, etc. When engaged in telehealth or supervision through technology, you must ensure that communications are secure and cannot be overheard by unauthorized third parties.
  - e. Storage of files and establishing a plan to keep data secure and accessible.
8. Administrative Issues:

- a. Clear business practices, including service-specific billing. If relying on AI-drive tools to assist with billing records, you are responsible for ensuring that clinical notes reflect the actual services provided.
  - b. Review of administrative record keeping, processes and workflows that utilize AI tools.
  - c. Technology availability and technical support to include review of hardware and software infrastructures dedicated to data security plans and policies.
9. Practitioner’s maintenance of professional boundaries in public media, such as social networking.

**Additional Resources:**

The National Association of Social Workers (NASW), Association of Social Work Boards (ASWB), Council on Social Work Education (CSWE), and Clinical Social Work Association (CSWA) Standards for Technology in Social Work Practice outlines the professional social work responsibilities: [https://www.socialworkers.org/includes/newincludes/homepage/PRA-BRO-33617.TechStandards\\_FINAL\\_POSTING.pdf](https://www.socialworkers.org/includes/newincludes/homepage/PRA-BRO-33617.TechStandards_FINAL_POSTING.pdf)