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

TOBI ZAVALA
Executive Director

October 16, 2015

Ms. Tina Williams
[redacted]

Dear Ms. Williams:

On October 1, 2015, the Board reviewed your application for licensure as a 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), 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)(b), use of fraud or deceit in connection with rendering services as a licensee or in establishing qualifications pursuant to this chapter.

These violations were based on the following findings:

1. On 08/20/15, your supervisor ("Supervisor") contacted Board staff to verify information regarding your licensure status.
2. At that time, Supervisor informed Board staff that she had two temporary licenses both given to her by you. One license held an expiration date of 03/03/15, and the other held an expiration date of 03/03/16.
3. During a subsequent interview with Board staff, Supervisor indicated the following:
   a. In 2014, you provided Supervisor with your temporary license, which was valid until 03/03/15.
   b. You were required to have a temporary license so you could be authorized to bill Medicaid for the 2014/2015 school year.
   c. During the summer of 2015, you were required to submit an updated license so you could continue billing Medicaid for the 2015/2016 school year.
   d. You then provided Supervisor with another temporary license, which was valid until 03/03/16.
   e. In 08/15, AHCCCS contacted the school after they had tried verifying your license and it came up invalid.
4. Upon review of the two temporary licenses, Board staff determined that the second temporary license with an expiration date of 03/03/16 had been created fraudulently.

5. When questioned about this issue during an investigative interview, you acknowledged creating the fraudulent temporary license.
6. Your conduct appears particularly concerning where:
   a. When your original temporary license expired, rather than taking a pay decrease because you could no longer bill Medicaid, you knowingly and willingly participated in creation of a fraudulent Board-issued license.
   b. Except for the fact that Supervisor brought this issue to the Board's attention, the Board would have had no way to know that you had created a fraudulent license.
   c. Moreover, you are currently licensed as an LCSW in the state of California, and as such should have recognized the potential ethical and legal ramifications associated with the creation of a fraudulent license.

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 20, 2015, 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 new licensure statute, as of July 1, 2004, only persons holding licenses to practice clinical social work 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

cc: Applicant's attorney