IN THE MATTER OF * BEFORE THE MARYLAND

JILL M. LARSON, LCSW-C * STATE BOARD OF

RESPONDENT * SOCIAL WORK EXAMINERS

License Number: 18215 * Case Numbers: 2022-3224, 2022-3225, 2022-3213

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CONSENT ORDER

On December 12, 2023, the Maryland State Board of Social Work Examiners (the "Board") issued *Charges Under the Maryland Social Workers Practice Act* against **JILL**M. LARSON, LCSW-C, (the "Respondent"), License Number 18215, charging her with violating the Maryland Social Workers Practice Act (the "Act"), Md. Code Ann., Health Occ. ("Health Occ.") §§ 19-101 *et seq.* (2021 Repl. Vol. and 2023 Supp.).

Specifically, the Board charged the Respondent with violating the following provisions of the Act:

§ 19-311. Denials, reprimands, suspensions, and revocations – Grounds

Subject to the hearing provisions of § 19-312 of this subtitle, the Board may deny a license to any applicant, fine a licensee, reprimand any licensee, place any licensee on probation, or suspend or revoke a license if the applicant or licensee:

- (2) Fraudulently or deceptively uses a license;
- (6) Violates any provision of this title or regulations governing the practice of social work adopted and published by the Board;

COMAR 10.42.08.07. Responsibilities of a Supervisor.

B. In addition to the requirements of § A of this regulation, the supervisor shall specifically instruct and provide guidance relating to the supervisee's scope of practice of social work under Health Occupations Article, §§ 19-301 and 19-307, Annotated

Code of Maryland, including:

(10) Documentation and record keeping requirements as set forth in Health-General Article, Title 4, Annotated Code of Maryland, and in accordance with COMAR 10.42.03

C. A supervisor shall:

- (1) Ensure that a supervisee is practicing within the scope of the supervisee's license;
- (4) Maintain documentation, for at least 5 years, of the supervisory sessions, including the dates, duration, and focus of the supervisory sessions;
- (9) Establish a written contract, on the form provided by the Board, for advanced licensure or independent practice, initiated before beginning supervision;
- (11) Complete the supervision verification form;
- (13) Provide a copy of the documentation required by Regulation .04 of this chapter:
 - (a) On request of the supervisee[.]

On January 17, 2024, a Case Resolution Conference was held before a committee of the Board. As a resolution of this matter, the Respondent agreed to enter into this public Consent Order consisting of the following Findings of Fact, Conclusions of Law, and Order.

FINDINGS OF FACT

The Board makes the following Findings of Fact:

I. Background

1. The Respondent was initially licensed to practice as a certified social worker – clinical ("LCSW-C") in Maryland on April 17, 2015. The Respondent's license has a status

of "active" and is set to expire on October 31, 2025. On December 17, 2018, the Respondent became a board-approved supervisor.

2. At all times relevant, the Respondent was employed and worked at the Center¹, an emergency shelter in Montgomery County, Maryland.

II. Complaints

- 3. On or about August 31, 2022, the Board received a complaint from a licensee ("Supervisee 1") alleging that the Respondent failed to sign her supervision contract and failed to adequately supervise her. In the complaint, Supervisee 1 stated that she began working at the Center in October 2021 and the Respondent agreed to be her clinical supervisor. The complaint alleged that the Respondent met with Supervisee 1 shortly after she began employment but did not review the supervision contract with Supervisee 1 and did not sign the contract. The complaint further alleged that Supervisee 1 placed the supervision contract in the Respondent's mailbox on October 14, 2021, but the contract was not signed. The complaint further alleged that Supervisee 1 did not hear anything about her contract until 5 months after she dropped it off and then she received it on February 24, 2022. Based upon the complaint, the Board initiated an investigation of the Respondent under Case Number 2022-3224.
- 4. On or about August 31, 2022, the Board received a second complaint from a licensee ("Supervisee 2") alleging that the Respondent forged her supervision contract and failed to properly train her about documentation standards for Center. In the second complaint, Supervisee 2 stated that she began her employment in December 2020 and was

¹ To maintain confidentiality, facility, witness, and employer names will not be disclosed in this document but will be provided to the Respondent upon request.

onboarded by the Respondent. Supervisee 2 stated that within a week of onboarding, she met with the Respondent to sign her supervision contract and to have her first supervision session. Supervisee 2 stated that after the Respondent's departure, it was brought to her attention that the Respondent forged her supervision contract and failed to teach her about documentation standards for the agency. She further alleged that the Respondent was evasive in providing her supervision notes upon request. Based upon the complaint, the Board initiated an investigation of the Respondent under Case Number 2022-3225.

5. On or about August 12, 2022, the Board received a complaint from the chief compliance director of the Center (the "Compliance Director") alleging that the Center had received complaints from Supervisee 1 and Supervisee 2 regarding supervision contracts entered into with the Respondent. The complaint stated that the Compliance Director and Center began an investigation of the Respondent and discovered that the Respondent had failed to timely sign the supervision contracts for Supervisee 1 and Supervisee 2 when they began and only did so several months later after Supervisee 1 and Supervisee 2 made multiple requests for them. The complaint further alleged that the supervision contracts contained the signatures of two human resources personnel but that the investigation revealed that those signatures were forged. Lastly, the complaint alleged that the Respondent failed to provide regular documentation of the clinical supervision she performed for Supervisee 1 and Supervisee 2. Based upon the complaint, the Board initiated an investigation of the Respondent under Case Number 2022-3213.

III. Board Investigation

6. On January 11, 2023, the Board sent a request to the Center requesting the Respondent's personnel file. On February 16, 2023, the Board received the Respondent's

personnel file which showed that the Respondent was hired on October 2, 2018, as Clinical and Program Director of the Center. On March 31, 2022, the Center terminated the Respondent's employment.

- 7. On February 10, 2023, the Board sent a subpoena to Supervisee 1 requesting a copy of her supervision contract with the Respondent. The Board obtained the supervision contract which showed that the Respondent signed and dated the contract, with the date October 8, 2021. The Board obtained a second supervision contract from Supervisee 1 showing the signatures of the Respondent, Supervisee 1, and a human resources officer, and was dated March 4, 2022.
- 8. Following the receipt of Supervisee 2's complaint, a subpoena was sent to Supervisee 2 requesting a copy of her supervision contract with the Respondent. The Board obtained the supervision contract which showed that the Respondent signed and dated the contract, with the date January 31, 2021. The Board obtained a second supervision contract from Supervisee 2 showing the signatures of the Respondent, Supervisee 2, and the Associate Director of Human Resources at the Center.
- 9. On March 6, 2023, Supervisee 1 was interviewed by the Board's Investigator under oath. During the interview, Supervisee 1 stated, in part:
 - a. She is employed as a bilingual mental health therapist at the Center.
 - b. She became aware that she was not receiving adequate clinical supervision after being informed by Supervisee 2.
 - c. She filed a complaint against the Respondent regarding not receiving proper clinical supervision.
 - d. She lost a lot of clinical supervision hours as a result of the Respondent being her clinical supervisor.
- 10. On March 15, 2023, Supervisee 2 was interviewed by the Board's Investigator under oath. During the interview, Supervisee 2 stated, in part:

- a. She is a therapist at the Center.
- b. She filed a complaint against the Respondent alleging that the Respondent forged her supervision contract and that she failed to properly train her regarding documentation status for Center. Specifically, the Respondent never taught her the protocol for documenting suicide and how to do a proper psychosocial evaluation.
- c. She became concerned about her clinical supervision notes on February 24, 2022, and contacted the Respondent regarding them. She received a response from the Respondent on February 28, 2022, saying that she would forward the notes by the end of the week. On March 2, 2022, the Respondent apologized to her for not sending her clinical notes on the same day she promised to send them.
- d. In or around March 9, 2022, she contacted the Division Director at the Center to begin the complaint process against the Respondent. She was interviewed by the Center as part of the internal complaint process, by two members of the human resources department, and was asked to review the signature on her supervision contract with the Respondent. She noticed that the date was off and there was no way she could have signed the contract.
- 11. On March 16, 2023, the Compliance Director was interviewed by the Board's Investigator under oath. During the interview, the Compliance Director stated, in part:
 - a. He is employed as the Chief Compliance Officer at the Center.
 - b. He reviewed the investigation regarding the Respondent conducted by the staff at the Center.
 - c. He knows the Respondent from her employment at the Center and that part of her duties included clinical supervision of Supervisee 1 and Supervisee 2.
 - d. He became aware that Supervisee 1 and Supervisee 2 requested copies of their supervision contracts.
 - e. He became aware of emails from a human resources officer and the Associate Director of Human Resources indicating that the signatures on the contracts for Supervisee 1 and Supervisee 2 were not theirs and that they never signed the contracts.
 - f. He reviewed the records of the internal investigation, including the supervision notes kept by the Respondent, showing that most of them are group supervision including other individuals who were not social workers. He described them as similar to general staff meetings.

- 12. On March 21, 2023, the Chief of Family Services at the Center was interviewed by the Board's Investigator under oath. During the interview, the Chief of Family Services stated, in part:
 - a. She was formerly the direct supervisor of the Respondent for a few years but then got a promotion.
 - b. She assisted in the investigation involving the Respondent, Supervisee 1, and Supervisee 2. She first heard from Supervisee 1 and Supervisee 2 and quickly involved the human resources department at the Center.
 - c. During the investigation, she discovered that the Respondent did not meet the requirements for the supervision contracts. The Respondent did not have fully executed contracts with Supervisee 1 or Supervisee 2 and there were questionable dates on them. She also found that the Respondent was very resistant to providing Supervisee 1 and Supervisee 2 with the information they needed, mostly because the Respondent did not document appropriately. She further found that the Respondent having administrative meetings with non-clinical, non-social work members and Supervisee 1 and Supervisee 2 and calling them clinical supervision. She finally found that the clinical supervision contracts between the Respondent and Supervisee 1 and Supervisee 2 had forged names from human resources personnel on the documents.
 - d. She interviewed Supervisee 1 and Supervisee 2 and discovered that neither one had signed their supervision contracts.
 - e. She met with the Respondent on March 31, 2022, and questioned her regarding the investigation. She then met with a member of the human resources department at the Center and then brought the Respondent back in and terminated her employment.
- 13. On March 27, 2023, the Associate Director of Human Resources was interviewed by the Board's Investigator under oath. During the interview, the Associate Director of Human Resources stated, in part:
 - a. She was the Associate Director of Human Resources at the Center.
 - She assisted in the internal investigation regarding the Respondent's supervision of Supervisee 1 and Supervisee 2.
 - c. As part of the internal investigation conducted, she was asked if she signed clinical supervision contracts between the Respondent and Supervisee 1 and Supervisee 2.

- d. She reviewed the contracts and reported that she did not sign and date the documents and that the signature and the date on the documents were not hers. The date listed on the contract was a Sunday, and she reported that she did not work that day.
- 14. On March 29, 2023, the Respondent was interviewed by the Board's Investigator under oath. During the interview, the Respondent stated, in part:
 - a. She was formerly employed at the Center as a program director and clinical director.
 - b. She supervised Supervisee 1 and Supervisee 2 and had signed contracts with both of them. She conducted supervision sessions with Supervisee 1 and Supervisee in person and virtually.
 - c. She denied forging the signature of the human resources officer on Supervisee 1's contract and denied forging the signature of the Associate Director of Human Resources on Supervisee 2's contract. She further stated that she provided the supervision appropriate as stated in her responsibilities as a supervisor.
 - d. She did not accept any responsibility for the three complaints that were filed against her.

CONCLUSIONS OF LAW

Based on the foregoing Findings of Fact, the Board concludes as a matter of law that the Respondent violated Health Occ. § 19-311(2), Health Occ. § 19-311(6), COMAR 10.42.08.07B10, COMAR 10.42.08.07C(1), COMAR 10.42.08.07C(4), COMAR 10.42.08.07C(9), COMAR 10.42.08.07C(11), COMAR 10.42.08.07C(13)(a).

ORDER

Based on the foregoing Findings of Fact and Conclusions of Law, it is this _

ORDER

Based on the foregoing Findings of Fact and Conclusions of Law, it is this **20**th day of **February**, **2024**, by a majority of the Board considering this case,

ORDERED that the Respondent be **SUSPENDED** for a period of thirty (30) days ;and it is further

ORDERED that following the suspension, the Respondent be placed on **PROBATION** for a period of two (2) years subject to the following conditions:

- 1. The Respondent shall be assigned to a Board approved supervisor. The Board-approved supervisor shall be required to submit quarterly reports to the Board.
- 2. The Respondent shall be responsible for ensuring that the Board-approved supervisor submits the quarterly reports timely.
- 3. Within three (3) months of the date of execution of the Consent Order, the Respondent shall successfully complete a Board-approved two (2) hour course(s) in ethics, which shall not be counted toward continuing education requirements for license renewal.
- 4. Within three (3) months of the date of execution of the Consent Order, the Respondent shall successfully complete a Board-approved two (2) hour course(s) in documentation, which shall not be counted toward continuing education requirements for license renewal.
- 5. The Respondent is **FINED** in the amount of FIVE HUNDRED DOLLARS AND ZERO CENTS (\$500.00) due to the Board within sixty (60) days of the execution of the Consent Order.

ORDERED that if the Board has reason to believe that the Respondent has failed to comply with any term or condition of this Consent Order, the Respondent shall be given

notice and an opportunity for a hearing. If there is a genuine dispute as to a material fact, the hearing shall be an evidentiary hearing before the Board. If there is no genuine dispute as to a material fact, the Respondent shall be given a show cause hearing before the Board; and it is further

ORDERED that after the appropriate hearing, if the Board determines that the Respondent has failed to comply with any term or condition of this Consent Order, the Board may impose additional civil monetary fine upon the Respondent; and it is further

ORDERED that the Respondent shall not serve or continue to serve as: a Board authorized sponsor, presenter and/or trainer of social work continuing education learning activities, an ethics tutor, an evaluator for the Board, or a Board-approved supervisor for a period of five (5) years from the effective date of this Consent Order; and it is further

ORDERED that the Respondent shall be responsible for all costs incurred in fulfilling the terms and conditions of this Consent Order; and it is further

ORDERED that the effective date of the Consent Order is the date the Consent Order is signed by the Board Chair or her designee. The Board Chair or her designee signs the Consent Order on behalf of the Board which has imposed the terms and conditions of this Consent Order; and it is further

ORDERED that this Consent Order is a **PUBLIC DOCUMENT** pursuant to Md. Code Ann., Gen. Provisions §§ 4-101 et seq. (2019 Repl. Vol.).

Susan Coppage, LCSW-C

Juan P. Conseje

Board Chair

Maryland State Board of Social Work Examiners

CONSENT

I, Jill Larson, acknowledge that I am represented by counsel and have consulted with counsel before entering into this Consent Order. By this Consent and for the purpose of resolving the issues raised by the Board, I agree and accept to be bound by the foregoing Consent Order and its conditions.

I acknowledge the validity of this Consent Order as if entered into after the conclusion of a formal evidentiary hearing in which I would have had the right to counsel, to confront witnesses, to give testimony, to call witnesses on my own behalf, and to all other substantive and procedural protections provided by the law. I agree to forego my opportunity to challenge these allegations. I acknowledge the legal authority and jurisdiction of the Board to initiate these proceedings and to issue and enforce this Consent Order. I affirm that I am waiving my right to appeal any adverse ruling of the Board that might have followed after any such hearing.

I sign this Consent Order after having an opportunity to consult with counsel, voluntarily and without reservation, and I fully understand and comprehend the language, meaning and terms of this Consent Order.

2/6/24 Date

Jill Carson

NOTARY

STATE OF MARYLAND CITY/COUNTY OF MONTGOMERY
/
I HEREBY CERTIFY that on this figure day of 6.
, 2024, before me, a Notary Public of the foregoing State and City/County
personally appear Jill Larson and made oath in due form of law that signing the
foregoing Consent Order was her voluntary act and deed.

AS WITNESSETH my hand and notary seal.

Notary Public

My commission expires:

MURTUZA HUSSAIN Notary Public - State of Maryland Montgomery County My Commission Expires Aug 22, 2027

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Maryland Board of Social Work Examiners