

## Supervision Rule Change Pros/Cons

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OAC 4732-13 Supervision (B) Supervisor responsibilities (9) A supervisor shall actively monitor the weekly number of clients and/or training subjects of supervisees who are working under professional work and/or training supervision, as defined in paragraph (A) or (B) of rule 4732-13-03 of the Administrative [Code]. Although there is no limit on the number of supervisees registered with the board as required in paragraph (B)(25) of this rule, a supervisor shall not on a weekly basis, emergency situations excepted, delegate work to supervisees that affects more than one hundred [sic] total clients and/or training subjects...

Option 1	Pros	Cons
<p>Retain current 100 weekly client limit and retain requirement of registration of supervisees</p>	<ul style="list-style-type: none"> <li>• Requires no action</li> <li>• Reduces the previous paperwork burdens of requiring Board permission to exceed four supervisees (regardless of the number of supervisee clients at issue)</li> <li>• Board retains oversight of amount of supervision a person can do</li> <li>• Provides guidance regarding what is a reasonable level of supervisees—providing some protection to the community</li> <li>• Provides some framework for disciplinary action when someone inadequately supervises someone because they took on too many supervisees</li> <li>• Allows the board to know who is supervising someone when a complaint is filed about a provider who is not licensed, but is supervised by a license holder</li> <li>• Limits someone from building a “supervision mill” practice</li> </ul>	<ul style="list-style-type: none"> <li>• Significant recording keeping burden for psychologists who want to be compliant (tracking each week to make sure that their supervisees don’t have more than 100 contacts)</li> <li>• Poses some problems for organizations that do high volume, routine, and generally low risk contacts (ie. prisons and others that do routine “screening” activities and/or many groups)</li> <li>• Difficulty with enforceability (how do you prove more than 100 contacts)</li> <li>• Ambiguity—Is it a hard 100 clients a week, or an average? Is it any psychological service (screening, consultation, therapy, assessment), or just some? What constitutes a client?</li> <li>• Inconsistent with any other State’s rules</li> </ul>

Option 2	Pros	Cons
<p>Return to old standard or modified standard of 4-6 FTE supervisees per supervisor and retain requirement of registration of supervisees</p>	<ul style="list-style-type: none"> <li>• Provides guidance regarding what is a reasonable level of supervisees— providing some protection to the community</li> <li>• Board retains oversight of amount of supervision a person can do</li> <li>• Provides some protection from overzealous employers requiring a psychologist from having to supervise too many people</li> <li>• Provides some framework for disciplinary action when someone inadequately supervises someone because they took on too many supervisees</li> <li>• Allows the board to know who is supervising someone when a complaint is filed about a provider who is not licensed, but is supervised by a psychologist</li> <li>• Consistent with many other States</li> <li>• Limits someone from building a “supervision mill” practice</li> </ul>	<ul style="list-style-type: none"> <li>• Could place undue limits on training agencies that have multiple supervisors for the same supervisee (shared supervision)</li> <li>• Some difficulty with enforceability if go to FTE option as the definition of a FTE allows for interpretation/manipulation.</li> <li>•</li> </ul>
Option 3	Pros	Cons
<p>Eliminate cap on weekly client numbers but retain requirement of registration of supervisees</p>	<ul style="list-style-type: none"> <li>• Releases the board from need to monitor # of supervisees</li> <li>• Allows the board to know who is supervising someone when a complaint is filed about a provider who is not licensed, but is supervised by a psychologist</li> <li>• Board “gets out of the way” of business of supervision</li> </ul>	<ul style="list-style-type: none"> <li>• Eliminates/reduces board’s ability to prevent “supervision mills”</li> <li>• Forces use of “negligence” standard if someone does take on too many supervisees with no real definition of reasonableness</li> <li>• Doesn’t provide guidance for what is a reasonable number of supervisees</li> <li>• Could lead organizations to force increased supervision requirements to unsafe levels on psychologists</li> <li>• No ability to address if someone clearly has too many registrants</li> <li>• Reduces board’s ability to manage practices by supervisees that are not being adequately monitored but are not responsible to the board since they aren’t licensed (increased risk to the community)</li> </ul>

Option 4	Pros	Cons
<p>Eliminate cap and eliminate requirement of registration of supervisees</p>	<ul style="list-style-type: none"> <li>• Releases the board from need to monitor # of supervisees</li> <li>• Zero paperwork for license holder and staff</li> <li>• Lower administrative overhead by board</li> <li>• Board "gets out of the way" of business of supervision</li> </ul>	<ul style="list-style-type: none"> <li>• Eliminates/reduces board's ability to prevent "supervision mills"</li> <li>• Forces use of "negligence" standard if someone does take on too many supervisees with no real definition of reasonableness</li> <li>• Doesn't provide guidance for what is a reasonable number of supervisees</li> <li>• Could lead organizations to force increased supervision requirements to unsafe levels on psychologists</li> <li>• No ability to address if someone clearly has too many registrants</li> <li>• Reduces board's ability to manage practices by supervisees that are not being adequately monitored but are not responsible to the board since they aren't licensed (increased risk to the community)</li> <li>• Forces use of "negligence" standard if someone does take on too many supervisees with no real definition of reasonableness</li> <li>• Doesn't provide guidance for what is a reasonable number of supervisees</li> <li>• Could lead organizations to force increased supervision requirements to unsafe levels on psychologists</li> <li>• Reduces board's ability to manage practices by supervisees that are not being adequately monitored but are not responsible to the board since they aren't licensed (increased risk to the community)</li> <li>• No way for the board to know if someone has too many registrants</li> </ul>