

Public comment regarding supervision of doctoral capstone students

(Received 3/20/2023)

To the Board of Occupational Therapy, for consideration regarding supervision parameters for doctoral capstone students:

Having spent a significant amount of time reflecting on this question, I believe what made that process difficult for me was the phrasing of the query. Rather than focusing on the supervisee role, I think the question is how many people can one OT supervise. Although the capstone student is not providing direct patient care, to provide them with the quality educational experience such an undertaking deserves, it will take time and attention from the supervising OT. If one argued there could be more capstone students since it's a non-clinical role, I feel that might be a misguided demand on the supervisor's ability to also attend to those providing patient care.

I'm not exactly sure where that ratio should be set, but I believe that one OT should not have to supervise more than four or five other people at any given time. There would also be the variables to consider, such as the size of their caseload and/or what other administrative duties are assigned to the OT. As for supervisee limits of four or five, the OT could be supervising:

- 2 OTA's, 1 OT student, and 1 capstone student (4)
- 1 OTA, 1 OT student, 1 limited permit OTA, and 2 capstone students (5)

Of course, there are a wide range of possibilities. One can see though, especially in the second scenario, that maybe five supervisees may not be a sustainable number. I feel it also shows the value of setting the limit on the supervisor and allows them and their supervisor to design the skill mix within the parameter.

Thank you for your time and consideration.

CALIFORNIA BOARD OF OCCUPATIONAL THERAPY REGULATIONS

§ 4180. Definitions

In addition to the definitions found in Business and Professions Code sections 2570.2 and 2570.3 the following terms are used and defined herein:

~~(a) "Client related tasks" means tasks performed as part of occupational therapy services rendered directly to the client.~~

(b) (a) "Level I student" means an occupational therapy or occupational therapy assistant student participating in activities designed to introduce him or her to fieldwork experiences and develop an understanding of the needs of clients.

~~(c)~~ (b) "Level II student" means an occupational therapy or occupational therapy assistant student participating in delivering occupational therapy services to clients with the goal of developing competent, entry-level practitioners.

(c) "Doctoral Capstone student" means an occupational therapy student completing a capstone project or capstone experience while enrolled in an ACOTE-accredited doctoral degree program.

(d) "Client related tasks" means tasks performed as part of occupational therapy services rendered directly to the client.

~~(d)~~ (e) "Non-client related tasks" means clerical, secretarial and administrative activities; transportation of patients/clients; preparation or maintenance of treatment equipment and work area; taking care of patient/client personal needs during treatments; and assisting in the construction of adaptive equipment and splints.

~~(e)~~ (f) "Periodic" means at least once every 30 days.

Note: Authority cited: Sections 2570.13 and 2570.20, Business and Professions Code.
Reference: Sections 2570.2, 2570.3, 2570.4, 2570.5, 2570.6, and 2570.13, Business and Professions Code.

CALIFORNIA BOARD OF OCCUPATIONAL THERAPY REGULATIONS
Title 16, Division 39, California Code of Regulations

§ 4181. Supervision Parameters

(a) Appropriate supervision of an occupational therapy assistant includes, at a minimum:

(1) The weekly review of the occupational therapy plan and implementation and periodic onsite review by the supervising occupational therapist. The weekly review shall encompass all aspects of occupational therapy services and be completed by telecommunication or onsite.

(2) Documentation of the supervision, which shall include either documentation of direct client care by the supervising occupational therapist, documentation of review of the client's medical and/or treatment record and the occupational therapy services provided by the occupational therapy assistant, or co-signature of the occupational therapy assistant's documentation.

(3) The supervising occupational therapist shall be readily available in person or by telecommunication to the occupational therapy assistant at all times while the occupational therapy assistant is providing occupational therapy services.

(4) The supervising occupational therapist shall provide periodic on-site supervision and observation of client care rendered by the occupational therapy assistant.

(b) The supervising occupational therapist shall at all times be responsible for all occupational therapy services provided by an occupational therapy assistant, a limited permit holder, a student or an aide. The supervising occupational therapist has continuing responsibility to follow the progress of each client, provide direct care to the client, and assure that the occupational therapy assistant, limited permit holder, student or aide do not function autonomously.

(c) The level of supervision for all personnel is determined by the supervising occupational therapist whose responsibility it is to ensure that the amount, degree, and pattern of supervision are consistent with the knowledge, skill and ability of the person being supervised.

(d) Occupational therapy assistants may supervise:

(1) Level I occupational therapy students;

(2) Level I and Level II occupational therapy assistant students; and

(3) Aides providing non-client related tasks; and

(4) No more than three Level I fieldwork students, Level II fieldwork students, Doctoral Capstone students, or Limited Permit holders at any one time, except by approval of the Board.

(e) An occupational therapist may supervise no more than three Level I fieldwork students, Level II fieldwork students, Doctoral Capstone students, or Limited Permit holders at any one time, except by approval of the Board.

~~(e)~~ (f) The supervising occupational therapist shall determine that the occupational therapy practitioner possesses a current license or permit to practice occupational therapy prior to allowing the person to provide occupational therapy services.

Note: Authority cited: Sections 2570.13 and 2570.20, Business and Professions Code.
Reference: Sections 2570.2, 2570.3, 2570.4, 2570.5, 2570.6, and 2570.13, Business and Professions Code.