



## **AD HOC COMMITTEE ON SUPERVISION STANDARDS MEETING MINUTES**

**September 17, 2024**

**Committee Members Present**

Denise Miller, Chair/Board Member  
 Beata Morcos, Board Vice President  
 Cesar Arada  
 Ada Boone Hoerl  
 Candace Chatman  
 Dominique Embrey  
 Joyce Fries  
 Heather Kitching  
 July Mclaughlin Gray  
 Terry Peralta-Catipon  
 Samia Rafeedie  
 Penny Stack

**Board Staff Present**

Heather Martin, Executive Officer  
 Rachael Hutchison, Manager  
 Austin Porter, Analyst

**Committee Members Absent**

Sharon Pavlovich, Board Member  
 Kersten Laughlin  
 Jessica Padilla  
 Liz Phelps  
 Erin Schwier

**Tuesday, September 17, 2024**

**8:00 am – Committee Meeting**

1. Call to order, roll call, establishment of a quorum.

The meeting was called to order at 8:15 a.m., roll was called and a quorum was established.

2. Committee Chair’s Opening Remarks.

Chair Denise Miller welcomed all in attendance.

3. Introductions by all Committee members.

The Committee members chose not to introduce themselves.

4. Public Comment for Items Not on the Agenda.

Ms. Deanna Mannarelli, Director of Fieldwork and Doctoral Capstone Coordinator for the Entry-Level OTD Program, and Assistant Professor of Clinical Occupational Therapy at the University of Southern California (USC) chose to introduce herself.

5. Review and vote on approval of the August 14, 2024, Committee meeting minutes.

*This agenda item was tabled until the next meeting.*

6. Consideration and possible recommendation to the Board on amending California Code of Regulations (CCR), Title 16, Division 39, Article 9, Section 4180, Definitions, and Section 4181, Supervision Parameters.

Executive Officer Heather Martin summarized the highlights from the August 14, 2024, Committee meeting, which included the need to clarify what the terms “no more than” and “at any one time” meant regarding supervision limitations.

Chair Miller asked that the Committee discuss the language in Section 4181(d)(5) and (d)(6) regarding the appropriate ratio of occupational therapy assistants supervising Level I fieldwork students, or Limited Permit holders at any one time and Section 4181(d)(6) no more than twenty Level I fieldwork students in a faculty-led fieldwork. Ms. Miller added that it would be impossible to address each scenario, however, the Committee was tasked with determining a ratio for supervision with consumer safety in mind.

Ms. Stack recalled that the number three originated from a committee member from the perspective of a parent of a patient/client wondering if their child received an acceptable quality of care with twenty students being supervised in a room while receiving care. The number twenty for supervision of Level I fieldwork students in faculty-led fieldwork originated from the idea that a faculty member might bring a portion of their class to a faculty-led site, although their maximum was fifteen students.

A robust discussion ensued regarding the language in Section 4181(d)(5) and (d)(6) regarding the appropriate ratio of occupational therapy assistants supervising Level I fieldwork students, or Limited Permit holders at any one time and Section 4181(d)(6) regarding no more than twenty Level I fieldwork students in faculty-led fieldwork.

Concern was noted about how fifteen to twenty students would even fit into the physical space of the fieldwork sites and that the site environment should be considered in general whether it is a school-based or hospital site, etc.

Ms. Boone Hoerl mentioned that according to her research, 81% of the states and territories do not have student supervision caps or limitations. However, California is a highly regulated state and the existing ratios were present due to violations that have taken place.

Mr. Arada and Ms. Rafeedie expressed concern about lumping Level I and Level II fieldwork students together when considering supervision limitations as they have different levels of familiarity.

The Committee discussed whether or not a Doctoral Capstone Student needed supervision.

A robust discussion ensued regarding separating Level I fieldwork students, Level II fieldwork students, and Limited Permit holders regarding supervision limitations. Concerns about consumer safety, practice setting, and corporations forcing

practitioners to have the maximum number of students to supervise to leverage free labor were raised. Another trepidation was that the practitioner's responsibility for patients/clients increases exponentially when supervising students.

Many Committee members agreed that three was a good maximum for the number of Level II students to be supervised at any one time.

After reviewing Florida's supervision guidelines, a suggestion was made to format California's guidelines similarly.

### **Public Comment**

Deanna Mannarelli, Director of Fieldwork and Doctoral Capstone Coordinator for the Entry-Level OTD Program, and Assistant Professor of Clinical Occupational Therapy at the University of Southern California (USC), agreed with uncoupling Level I and Level II students when considering supervision limitations. Ms. Mannarelli added that a student could be Level I for as short as one to five days during an entire semester.

Chair Miller asked Ms. Mannarelli how many students USC typically sent out to one fieldwork site.

Ms. Mannarelli replied that USC usually sent two to three students to one fieldwork site. Some sites will host Level I students, Level II students, and Doctoral capstone students without jeopardizing the quality of care to the patients/clients. Ms. Mannarelli expressed concern that if a fieldwork site hosted three Level II students, they could not host any Level I students.

The committee discussed defining the clinical experience, as not all clinical experiences look the same across the education programs. At a fieldwork site, doctoral capstone students could spend more time supporting a Level II student while Level I students observed.

A recommendation was made to consider not having supervision limitations applied to Level I students. At Level I, the students are gaining exposure to the patient population. They are not expected to put their hands on a patient. The observation of Level I students can be varied allowing for more flexibility. At times, other healthcare professionals oversee the Level I students. However, it was pointed out that the experience of a Level I student could vary as it was not in writing. Level I fieldwork students could participate in terms of engaging with a patient/client in other ways.

The consensus of the committee regarding the language in Section 4181(e)(2) was to remove the phrase, "at any one time" and to add "no more than" before Level I fieldwork students, Level II fieldwork students, and Doctoral capstone students. There was a brief discussion regarding Section 4181(e)(1) and moving it to subsection (e)(3).

Ms. Stack expressed the need to clarify what the supervision of a Level I fieldwork student entailed, for example, should the supervisor need to be in the student's line of sight or was being accessible enough?

Taking the word "clinical" out of 4180(e)(2) and adding "engaged in patient/client care" and taking the number "twenty" out of 4180(e)(3) was suggested.

The idea that it should be the responsibility of the practitioner to decide when they are supervising too many students as opposed to the Board making that decision for the practitioner was discussed.

Kristen Neville, State Affairs Manager at American Occupational Therapy Associate, added that no study has identified the perfect number of students for a practitioner to supervise.

The Committee agreed to add language to 4180(e) that read, “no more than a total of three Level I fieldwork students directly engaged in client-related tasks.”

7. Review of CCR Title 16, Division 39, to identify other sections possibly affected by proposed amendments to CCR Sections 4180 and 4181 and recommend proposed regulatory amendment(s) to the Board to ensure consistency.

*This agenda item was tabled until the next meeting.*

8. Discussion on the need for a future meeting.

The Committee agreed to meet on September 25<sup>th</sup> and was optimistic that they would be ready to vote on the proposed language for Sections 4180 and 4181 during that meeting.

9. New suggested agenda items for a future meeting.

*This agenda item was tabled until the next meeting.*

**The meeting adjourned at 9:53 a.m.**