



AD HOC COMMITTEE ON SUPERVISION STANDARDS MEETING MINUTES

September 25, 2024

Committee Members Present

Denise Miller, Chair/Board Member
 Cesar Arada
 Ada Boone Hoerl
 Candace Chatman
 Domenique Hendershot-Embrey
 Joyce Fries
 Heather Kitching
 Kersten Laughlin
 Sharon Pavlovich
 Terry Peralta-Catipon
 Liz Phelps
 Samia Rafeedie
 Penny Stack

Board Staff Present

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

Committee Members Absent

Beata Morcos, Board Vice President
 Erin Schwier
 Jessica Padilla
 July McLaughlin Gray

Wednesday, September 25, 2024

8:00 am – Committee Meeting

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

The meeting was called to order at 8:06 a.m., roll was called and a quorum was established.

2. Committee Chair’s Opening Remarks.

Chair Denise Miller welcomed everyone in attendance. Ms. Miller announced that the committee is developing language for the board to consider regarding supervision standards. The Committee has been focused on defining different levels of students and fieldwork, as well as, discussing supervision ratios. The goal is to reach a consensus and vote on the language before the November board meeting.

3. Introductions by all Committee members.

The committee members chose not to introduce themselves.

4. Public Comment for Items Not on the Agenda.

There were no comments for items not on the agenda.

5. Review and vote on approval of the September 17, 2024, Committee meeting highlights.

This item was informational only. Meeting minutes will be provided at 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.

The board changed the maximum number of fieldwork students that could be supervised by an occupational therapist from two to three based on feedback and input from AOTA, OTAC, and public comments.

There was discussion about the wording and clumping of the different types of fieldwork students, and it was ultimately agreed that the current proposed language is reasonable.

There was a suggestion to include language that allowed for exceptions to the maximum number of fieldwork students if approved by the board, however, a process to be approved by the Board does not exist at this time. The Board must detail what that process would look like in its regulations. The committee agreed to add the language "except as approved by the Board" after the language, "no more than a total of three" in Section 4181(e).

An attendee asked for clarification regarding, "no more than three" and it was explained that the limit is a total of three students of any combination or category.

Another attendee noted that Level I students could be supervised by someone other than an occupational therapist or occupational therapy assistant, and those individuals are not subject to the supervision limitations established by the Board.

It was added that in non-occupational therapy settings, a Level I could be about the exposure to populations and methods of interactions, in short, it would be more of an observational activity. Level I students could also help their supervising occupational therapist or occupational therapy assistant set something up for their session, which would not be considered a skilled service, and the primary intention would still be the exposure to a population and their needs.

The Board's law only mentions "accredited" programs, while the Committee's proposed regulatory language mentions "pre-accredited" and "candidacy status." However, the regulatory language cannot be broader than the law, but there might be potential for a bill to change the definition. The committee would consider revising the language to match the law.

The Committee discussed the language in Section 4181(g)(2) regarding the supervision of Level I fieldwork students by occupational therapists. Suggested phrases included, "strictly observational," "solely observational," or "exclusively observational."

It was pointed out that students could observe in one session and support in another and that there never would be an exclusively observational Level I student. To that extent, the Committee discussed the relevance of keeping 4181(g)(2). Ultimately, the consensus was to keep Section 4181(g)(2).

The Committee discussed adding, “at any one time,” back into Section 4181(e)(1). After they had agreed to add the phrase, “engaged in client-related tasks,” the phrase, “at any one time” became necessary.

Concerning Section 4181(g)(2), a suggestion was made to remove the word “observing” as it was too specific and replace it with the phrase, “Level I fieldwork students that are not engaged in direct patient/client care.”

The Committee deliberated on using the words, “accredited,” “pre-accredited,” and “candidacy status.” The members were reminded that the definition of “student” that the Committee previously agreed upon included those terms. However, it was pointed out that the statutory language only mentions, “accredited,” and the regulations cannot be broader than the laws. A bill would need to be introduced to include “pre-accredited” and “candidacy status” in the law. Therefore, the Committee agreed to bring two versions of the definition of “student” before the Board, one with the terms “pre-accredited” and “candidacy status” and one without.

The consensus was to make both sections gender-neutral by using the terms, “they” and “them.”

The consensus was to omit the phrases, “occupational therapy” to “occupational therapist,” throughout the definitions in Section 4180(b), (c), and (d), as those are mentioned in the definition of “student.”

The Committee then defined the Level I fieldwork student as, “participation in activities designed to introduce the student to fieldwork, apply knowledge to practice, and develop an understanding of the needs of clients.”.

The Committee then defined the Level II fieldwork student as “participation in delivering occupational therapy services, under the direct supervision of a licensee, to clients with the goal of developing competent, entry-level practitioners.

The Committee agreed to propose new language for Section 4181(d) regarding supervision by occupational therapy assistants as follows:

(d) Occupational therapy assistants may supervise doctoral capstone students completing an experience in research skills, administration, leadership, program and policy development, advocacy, or education, as required by an accredited educational program and no more than a total of three:

- (1) Aides providing non-client related tasks. ;*
- (2) Level I fieldwork students directly engaged in client-related tasks or patient/client care;*
- (3) Level II fieldwork students, at any one time;*
- (4) Doctoral capstone students completing a clinical, direct patient/client care experience, at any one time;*

(5) Occupational therapist limited permit holders, at any one time; and

*(6) Occupational therapy assistant limited permit holders,
at any one time.*

Chair Miller noted that the Committee would be provided with language that incorporated their discussions that day at the next meeting and that all highlights and minutes would be brought back from the previous meetings that needed to be voted on.

There were no additional Committee member remarks.
There were no additional public comments.

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 for a future meeting.

8. Discussion on the need for a future meeting.

The Committee agreed to meet again in mid-October.

Meeting adjournment at 10:02 a.m.