

AGENDA ITEM 12

**CONSIDERATION AND POSSIBLE ACTION ON DETERMINING THE
MAXIMUM NUMBER OF OCCUPATIONAL THERAPY STUDENTS
COMPLETING THEIR FIELDWORK THAT CAN BE SUPERVISED BY AN
OCCUPATIONAL THERAPIST WHO IS CONCURRENTLY SUPERVISING
OCCUPATIONAL THERAPY ASSISTANTS AND/OR LIMITED PERMIT
HOLDERS.**

CALIFORNIA CODE OF REGULATIONS

Article 9. Supervision Standards

§ 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) "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) "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.
- (d) "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) "Periodic" means at least once every 30 days.

§ 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.
- (e) 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.

§ 4182. Treatments Performed by Occupational Therapy Assistants

- (a) The supervising occupational therapist shall determine the occupational therapy treatments the occupational therapy assistant may perform. In making this determination, the supervising occupational therapist shall consider the following:
 - (1) the clinical complexity of the patient/client;
 - (2) skill level of the occupational therapy assistant in the treatment technique; and
 - (3) whether continual reassessment of the patient/client status is needed during treatment. This rule shall not preclude the occupational therapy assistant from responding to acute changes in the client's condition that warrant immediate action. The occupational therapy assistant shall inform the supervising occupational therapist immediately of the acute changes in the patient's/client's condition and the action taken.
- (b) The supervising occupational therapist shall assume responsibility for the following activities regardless of the setting in which the services are provided:
 - (1) Interpretation of referrals or prescriptions for occupational therapy services.
 - (2) Interpretation and analysis for evaluation purposes.
 - (A) The occupational therapy assistant may contribute to the evaluation process by gathering data, administering standardized tests and reporting observations. The occupational therapy assistant may not evaluate independently or initiate treatment before the supervising occupational therapist performs an assessment/evaluation.
 - (3) Development, interpretation, implementation, and modifications of the treatment plan and the discharge plan.
 - (A) The supervising occupational therapist shall be responsible for delegating the appropriate interventions to the occupational therapy assistant.
 - (B) The occupational therapy assistant may contribute to the preparation, implementation and documentation of the treatment and discharge summary.

§ 4183. Treatments Performed by Occupational Therapy Limited Permit Holders and Students

- (a) Consistent with Code section 2570.4, subdivisions (b) and (c), a Level II student may, at the discretion of the supervising occupational therapy practitioner, be assigned duties or functions commensurate with his or her education and training.
- (b) All documented client-related services by the limited permit holder or student shall be reviewed and cosigned by the supervising occupational therapist.

CBOT SURVEY OF CALIFORNIA OT AND OTA PROGRAMS

PROGRAMS	Earn PDUs for supervising Entry-Level Doctoral Capstone Experience? IF Yes, how many PDUs?	Max number of Fieldwork students supervised by an OT when concurrently supervising OTAs and/or LP holders	Max number of students completing doctoral capstone when concurrently supervising OTAs, LP holders, and/or Fieldwork students	Comments
CSU Dominguez Hills	Yes 12 PDUs			#1
Dominican University of California	Yes 12 PDUs			#2
Grossmont College	Yes	2 Students		#3
Keck Graduate Institute	Yes 12 PDUs	5 students		#4
Loma Linda University	Yes 12 PDUs	2-3 students	1-3 students	#5
Sacramento City College	Yes Unsure of specific amount	Unsure of specific amount. A lot of variables.		#6
Samuel Merritt College		2 students. Up to 4 students emergency situation (Covid-19)		#7
San Jose State University	Yes 12 PDUs	2 students	2 students	#8

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San Jose State University	Yes 12 PDUs	2-3 students Request in writing for more.	2-3 students Depends on setting.	#9
Stanbridge University		Unsure of specific amount. Site by site decision.		#10
University of the Pacific-Sacramento	Yes 12 PDUs	5 students		#11
University of Southern California	Yes 12 PDUs	2-4 students		#12
University of St. Augustine	Yes Unsure of specific amount	4 Students		#13
West Coast University- Los Angeles	Yes 12 PDUs	3 students		#14

COMMENTS PROVIDED TO CBOT SURVEY OF CALIFORNIA OT AND OTA PROGRAMS

1. **CSU Dominguez Hills** - Program Coordinator
Doesn't see much difference between clinical practice research and evidence-based practice. Also shared that they are in the process of refining their curriculum. Currently, the coordinator for the Post Professional Doctoral program is vacant.
2. **Dominican University of CA** – Academic Fieldwork Coordinator
Stated they will have an OT Entry Level Doctoral and/or Post Professional Doctoral Program in place until 2024. They currently offer Entry level MSOT and BS to MSOT.
3. **Grossmont College**- Fieldwork Coordinator
OTs should receive PDUs for supervising Doctoral students. Level I student supervision isn't as critical as level II. Level I fieldwork students sometimes work in groups up to 6. No more than 2 students completing Fieldwork supervised by an OT concurrently supervising OTAs and/or LP holders. ACOTE may have more guidance.
4. **Keck Graduate Institute**- Program Director
Believes Supervising OTs should receive credit for supervising for any level. Says 12 PDUs max to be consistent across the board. When asked about how many students can be safely supervised by an OT with and without OTAs says it depends on the type of placement. Would like to see more flexibility with level I & II students 5 or more per OT, as some students learn better in groups. Added that there should be training in place for new fieldwork educators for the safety of the consumer and students.
5. **Loma Linda Univ**- Capstone Coordinator
OTs receiving PDUs for supervision of doctoral level students would be beneficial. OTs should receive 12 of the required 24 PDUs but no more than 12. How many students can be safely supervised? Says for capstone 1-3 students (2 perfect number) depending on how the students are assigned, the type of capstone project, level of supervision needed, if they supervise other students etc. Believes it can be helpful for fieldwork students to work in groups (2-3 students) as they are able to assist one another. Would like to see the exploration of OTs supervising capstone and fieldwork students simultaneously.
6. **Sacramento City College**- Program Coordinator
No concrete answer as to max number of fieldwork students supervised by an OT concurrently supervising OTAs and/or LP holders. There are a lot of variables that come into play as OTAs can supervise Level I students, what if the OT isn't supervising an OTA and is the LP holder OT or OTA. Would like to see PDUs for supervising Doctoral students and would like to see OTAs included as well.
7. **Samuel Merritt College**- Assistant Professor
Practitioners can safely supervise 2 fieldwork students. In an emergency situation like Covid-19 some practitioners took on up to 4 students.

8. **San Jose State Univ.-** Academic Fieldwork Coordinator
OTs should earn continuing education. Says it can sometimes be difficult to secure spots for fieldwork and this will help to get more OTs interested in supervising with an incentive like earning continuing education for entry level and post professional doctoral students. Says more than 12 PDUs should be allowed to be earned for supervising fieldwork level II students. Comfortable with 2 students per supervising OT whether they are supervising OTAs as well or not.
9. **San Jose State Univ.-** Department Chair
OTs should receive PDUs for supervising doctoral students; 12 max same as with fieldwork students. Says 2-3 Entry-Level Doctoral Capstone supervised by an OT concurrently supervising OTAs, LP holders and/or FW students. Depends on the setting as Capstone students may not need as much supervision as fieldwork students. 2-3 students completing Fieldwork supervised by an OT concurrently supervising OTAs and/or LP holders. Practitioners should request in writing if they'd like to supervise more.
10. **Stanbridge Univ-** Academic Fieldwork Coordinator
Supervision of fieldwork students varies site by site as there are a lot of emerging practice areas. Unsure of a specific maximum amount of fieldwork students that can be supervised.
11. **UOP Sacramento-** Program Director
Says this is a great idea and glad that the Board is looking into this and that supervisors should be able to get 12 for each term with capstone students. 5 students max supervised by an OT concurrently supervising OTAs and/or LP holders.
12. **USC-** Academic Fieldwork Coordinator
Supervision of doctoral students: ACOTE standard C1.10 does not define "full time week" as 40 hours. They don't even define it (which is a whole other confusing issue), BUT I get what you're saying. I think the OT supervising students during their Doctoral Capstone Experience should get 1.5 PDUs as an incentive to be doctoral candidate supervisors and the amount of time they are putting in with the student.

How many students may be safely supervised: Fieldwork literature supports students being supervised by 1 OT as group supervision. It allows the students to learn from each other as well as the OT. (Literature provided below)

- Flood, B., Haslam, L., & Hocking, C. (2010). Implementing a collaborative model of student supervision in *New Zealand Journal of Occupational Therapy*, 57(1), 22-26.
- Kinsella, A.T., Piersol, C.V. (2018). Development and Evaluation of a Collaborative Model Level II Fieldwork Program. *The Open Journal of Occupational Therapy*. 6(3), <https://doi.org/10.15453/2168-6408.1448>
- Hanson, D. & Deluliis, E.D. (2015) The Collaborative Model of Fieldwork Education: A Blueprint for Group Supervision of Students, *Occupational Therapy in Health Care*, 29:2, 223-239.

However, I think that in some settings, the OTs are very hesitant to have multiple students and move away from the 1:1 model- possibly for their own sanity. I imagine it's stressful for them to try this new way of supervising and figuring out how to teach more than one student at a time and meet their productivity.

(Comment number 12 continued)

The answer to this question also depends on the setting! We have many OTs in the community mental health setting that supervise more than one student in a group model successfully. Depending on the setting I think an OTR/L can supervise between 2-4 students safely. I also wanted to add that these opinions are my own as a fieldwork coordinator. They don't represent the entire team or school.

13. University of St. Augustine- Academic Fieldwork Coordinator

OTs should be able to receive PDUs for supervising doctoral students and believes this is a great idea. Unable to give a specific amount of PDUs it would depend on how much many hours supervised and the type of fieldwork assigned. Believes OTs can safely supervise up to 4 students whether they are supervising OTAs/LPs or not.

14. West Coast Univ.- Academic Fieldwork Coordinator

OTs supervising OTD students should receive the same amount of PDUs as OTs supervising fieldwork with the max being 12. Believes 3 students may be safely supervised by one OT w/ or w/o OTAs LPs under their supervision.