

Clarification on Number of Supervisees per Supervisor *Effective January 1, 2025*

A new law, [SB 1024](#), sponsored by the Board of Behavioral Sciences (Board), becomes effective on January 1, 2025. It clarifies two key points regarding the number of supervisees a supervisor can have: first, it defines who qualifies as a supervisee in group supervision, which is capped at eight individuals; and second, it specifies who is included in the limit of six supervisees receiving individual or triadic supervision per supervisor in nonexempt settings.

1. Change #1: Number of Supervisees in Group Supervision

Previously, the law stated that group supervision was defined as two hours of face-to-face contact between one supervisor and no more than eight supervisees.

Effective January 1, 2025, the law defines group supervision as two hours of face-to-face contact between one supervisor and no more than eight persons receiving supervision for providing clinical mental health services.

Why did this change?

In the past, there has been confusion about who counts as one of the allowable eight “supervisees” in group supervision. For example, there were questions about whether a psychology pre-licensure, a social work intern, or a licensed marriage and family therapist who is being required by their employer to receive group supervision for professional development purposes, counted as one of the eight allowed in the group.

Therefore, the Board sponsored SB 1024 to clarify that any person receiving supervision for providing clinical mental health services counts as one of the allowable eight in the group.

When is this law applicable?

If there is a person in the group required by the Board’s laws to be under supervision, then this limit of eight applies in order to ensure that they receive adequate supervision. If there are no individuals in the group required by the Board’s laws to be under supervision, then the limit of eight does not apply.

Who counts as a member of the group?

Anyone receiving supervision for providing clinical mental health services counts as one of the eight members of the group that are allowed. Examples include, but are not limited to: associate marriage and family therapists, associate clinical social workers, associate professional clinical counselors, marriage and family therapist trainees, social work interns, professional clinical counselor trainees, licensed marriage and family therapists, licensed clinical social workers, licensed professional clinical counselors, licensees or pre-licensees of the Board of Psychology, applicants working under the Board's 90-day rule (individuals who have graduated and are awaiting their registration number), or individuals providing clinical mental health services without a license or registration in an exempt setting.

Does this apply to group supervision that takes place in exempt settings?

Yes. This applies to supervision in any setting, whether exempt or nonexempt, if there is a person in the group who is required by the Board's laws to be under supervision.

Does this apply to past group supervision?

The clarification applies to any group supervision that takes place on or after January 1, 2025.

Did the definition of triadic supervision change?

Yes. The definition of triadic supervision has also been clarified to mean contact between one supervisor and two persons receiving supervision for providing clinical mental health services. Previously the law defined it as being between one supervisor and two supervisees.

2. Change #2: Number of Supervisees per Supervisor in Nonexempt Settings

Previously, the law stated that supervisors in nonexempt settings cannot serve as individual or triadic supervisors for more than six supervisees at any time. It also stated that these supervisees may be associate marriage and family therapists, associate professional clinical counselors, associate clinical social workers, or any combination thereof.

Effective January 1, 2025, the law has been changed to state that supervisors in nonexempt settings cannot serve as individual or triadic supervisors for more than a total of six persons at any one time who are: 1) Receiving supervision for providing clinical mental health services in a nonexempt setting; and 2) Not fully licensed at the highest level for independent clinical practice. In addition, the law now also clarifies that

the limit of six supervisees per supervisor applies across all nonexempt settings in which the supervisor is working, if they work for multiple employers.

Why was this change made?

The change was made because although the law clearly limited the number of supervisees per supervisor in nonexempt settings to six associates, it was not clear if this limit applied to other types of supervisees, such as trainees or those working under the 90 day rule. Because the purpose of limiting the number of supervisees is to ensure quality supervision, the Board determined that a clarification was needed.

Additionally, the law was unclear about whether the limit of six supervisees per supervisor applied per nonexempt setting or could total six across all nonexempt settings where the supervisor was working, if they were working for multiple employers.

What is the definition of an exempt setting? A nonexempt setting?

An exempt setting is defined in law as a governmental entity, a school, a college, a university, or an institution that is both nonprofit and charitable. Unlicensed or unregistered employees or volunteers working in these settings are exempt from the Board's practice acts if their work is performed under the oversight and direction of the entity, and if they provide their clients with a notice containing specified information, detailing how to file a complaint with the agency.

A nonexempt setting is any setting that does not qualify as an exempt setting. It includes private practices, professional corporations, and any other types of entities that don't meet the definition of an exempt setting.

Who is included in the limit of six individual or triadic supervisees per supervisor in nonexempt settings?

Under the law change, effective January 1, 2025 any person who is receiving individual or triadic supervision for providing clinical mental health services in a nonexempt setting, and who is not fully licensed at the highest level for independent clinical practice, counts toward the limit of six individual or triadic supervisees. This includes, but is not limited to: associate marriage and family therapists, associate clinical social workers, associate professional clinical counselors, marriage and family therapist trainees, social work interns, professional clinical counselor trainees, pre-licensees of the Board of Psychology, applicants working under the Board's 90-day rule (individuals who have graduated and are awaiting their registration number). *(Note: Please remember that trainees, social work interns, and applicants utilizing the 90 day rule may not work in a private practice or a professional corporation, but are permitted to work in other types of nonexempt settings.)*

Please be aware that if a supervisor oversees a fully licensed individual who is at the highest level for independent clinical practice (such as an LMFT, LPCC, LCSW, or licensed psychologist), this individual does not contribute to the limit of six supervisees.

Does the limit apply to exempt settings?

No. There is no limit to the number of individual or triadic supervisees a supervisor working in an exempt setting may have.

If a supervisor works in multiple settings, comprising both exempt and nonexempt settings, only the supervisees in the nonexempt settings contribute to the maximum allowable total of six.

Do group supervisees count toward this limit?

No. As detailed above, a supervisor may supervise up to eight in a group supervision session. Only a supervisor's individual and triadic supervisees in nonexempt settings count toward the limit of six.