

**STATE OF NEVADA BOARD OF PSYCHOLOGICAL EXAMINERS’  
AD HOC COMMITTEE TO CONSIDER REGISTRATION OF SUPERVISORS OF  
PSYCHOLOGICAL ASSISTANTS, PSYCHOLOGICAL INTERNS, AND  
PSYCHOLOGICAL TRAINEES, AND ASSOCIATED CONCERNS**

**MEETING MINUTES**

May 31, 2023

**1. Call To Order/Roll Call to Determine the Presence of a Quorum.**

**Call to Order:** Committee Chair Dr. Whitney Owens called to order at 9:03 a.m. the meeting of the Nevada Board of Psychological Examiners’ Ad Hoc Committee to Consider Registration of Supervisors of Psychological Assistants, Psychological Interns, and Psychological Trainees, and Associated Concerns (“the Registration of Supervisors Committee”).

**Roll Call:** Committee Chair, Whitney Owens and Committee members, Lorraine Benuto and William O’Donohue were present at roll call. Member Ben Adams was absent at roll call, but joined the meeting at 9:20 a.m. Member Michelle Paul was absent. Despite the two member absences at roll call, there was a quorum of the Committee members.

**2. Public Comment** - Public comment is welcomed by the Committee and may be limited to three minutes per person at the discretion of the Committee Chair. Public comment will be allowed at the beginning and end of the meeting, as noted on the agenda. The Committee Chair may allow additional time to be given a speaker as time allows and in their sole discretion. Comments will not be restricted based on viewpoint. No action may be taken upon a matter raised under this item of the agenda until the matter itself has been specifically included on an agenda as an item upon which action may be taken (NRS 241.020)

There was no public comment at this time.

**3. (For Possible Action) Discussion, Deliberation, and Possible Action to approve the minutes of NBOPE’s Ad Hoc Committee to Consider the Registration of Supervisors of Psychological Assistants, Psychological Interns, and Psychological Trainees’ May 3, 2023, meeting.**

There were no comments or changes suggested for the minutes of the May 3, 2023, meeting.

*On motion by Lorraine Benuto, second by William O’Donohue, the Nevada State Board of Psychological Examiners approved the minutes of the Committee held on May 3, 2023. (Yea: Whitney Owens, Lorraine Benuto, William O’Donohue.) Motion Carried: 3-0.*

#### **4. (For Possible Action) Discussion, Deliberation, and Possible Action by NBOPE's Ad Hoc Committee to Consider and Make Recommendations to the Board Regarding the Registration of Supervisors of Psychological Assistants, Psychological Interns, and Psychological Trainees.**

This agenda item may include, but is not limited to, the discussion, deliberation, and possible action to make recommendations to the Board regarding the Committee's evaluation of the Board's supervisor regulations as they relate to various similar state and federal regulations regarding the qualifications and requirements for supervisors.

Lorraine Benuto reviewed the Association of State of and Provincial Psychology Boards Supervision Guidelines for Education and Training Leading to Licensure as a Health Service Provider ("Association's Guidelines") and cross compared the same with California and Oregon. In Oregon, Dr. Benuto notes they only had post-doctoral guidelines while in California the primary supervisor has to be employed in the same work setting as trainee, be available 100% of the time while training for psychological experience, the primary supervisor must be licensed, and trainees shall be provided with supervision for 10% of the total time worked each week with a minimum requirement of one (1) hour. Dr. Benuto did observe that the Association's Guidelines indicate that for jurisdictions which require post-doctoral training for licensure, they do not generally require practicum training yet there are guidelines for ideal supervision still provided. California's language does have detailed information, including how many supervised psychological hours a trainee needs to have pre doctoral. California gets really detailed in what they lay out for licensure, which Dr. Benuto believes is similar to Nevada. Although, Dr. Benuto points out she believes Nevada includes the information in a separate section, not as part of the supervision requirements such as California.

Dr. Owens wanted to know if Dr. Benuto was able to compare the language that has been adopted but not included in NAC (specifically, NAC 641). Dr. Benuto did read through NAC but did not explicitly cross-compare. She does note that she noticed in California and Nevada there is a similar provision regarding face-to-face supervision having to occur in person, but she is not sure if this was required before or after COVID as some people are still being cautious.

Dr. Owens believes NAC should be revised to be clear, so supervisors know what they are responsible for. As it is currently written, Dr. Owens believes there is good language regarding what supervisors are responsible for, yet when compared to California's language, Dr. Owens feels like California really put it in writing what is required. Director Arnold indicated that in the current supervised practice plan for trainees, interns, or assistants, the supervisor has to check some boxes yes (such as: have you been licensed for 3 years, have you done the coursework (CEs), and identification of coursework with additional requirements indicated). The NAC requirements are included in the supervised

practice plans to determine criteria is met. Dr. Benuto states that the NAC guidelines are super detailed, while California's are briefer.

Dr. Benuto pointed out that another similarity between Nevada and California is the specifications for pre-doctoral (pre intern, internship) and post-doctoral training. There is a line in the NAC that Dr. Benuto saw that defines a psychological trainee to include language revolving around an individual seeking reimbursement for Medicaid. It was clarified that a psychological trainee referred to individuals who were seeking reimbursement for Medicaid, but Dr. Benuto believes this contradicts that discussion. Dr. Benuto was not certain her interpretation was accurate, however. The Committee then reviewed NAC 641.1507. Dr. Owens thinks the language is not saying the person has to register, but instead indicates that the language clarifies that a supervisor is defined as a supervisor regardless of whether or not the person is being reimbursed.

Dr. Owens is not confident the language states that supervisors are also responsible for helping students through the registration process. While Dr. Owens does not want to add an additional publication level to the process, she does want supervisors to know they are responsible for the student registration as there are parts for the supervisors to complete, students to complete, and for supervisor assistance in the process. It was brought to the Committee's attention that individuals not coming through an APA program may not have seen this language before (NAC, NRS). Therefore, the Committee is relying on the supervisors in the community to provide training because the institutions are not including that information. Dr. Benuto shared a similar situation where the information was foreign to her during her post-doctorate. She suggested a tool kit or including a sample of a complete application as Dr. Benuto believes examples will be useful.

Dr. O'Donohue believes the big picture is to mandate registration for supervisors, so his view would be to make decisions by votes when other members are present. Although Dr. O'Donohue does indicate he would vote no.

The second issue according to Dr. O'Donohue is the quality of supervision. He would require a specific number of CE units prior to supervision yet allow those units to also be part of the 30 required for renewal. In his opinion, this would not help ensure quality.

The third component would be registration of trainees because each state is different per Dr. O'Donohue. Then the Committee should try to come up with a user-friendly procedure for supervisors and the students both to have information laid out clearly in an attempt to aid people through the process. Dr. O'Donohue believes the Committee should then follow up with questions to the supervisors and students to determine what was and was not helpful.

Finally, the fourth component would be the three (3) years of technical experience before an individual can supervisor. Dr. O'Donohue believes the Committee is conceptually close to setting up the ancillary issues and thinks the next few meetings should sum up their discussions.

*\*Dr. Adams joined\**

Dr. Owens reviewed the language in R074-18 to determine if language should be added regarding the supervisor's responsibility, as well as to ensure documentation is complete for recommendations to be made next time to revise the guidelines. Section 8, number 5, was read aloud. Dr. Owens indicated she would make her recommendations at a future time.

**5. (For Possible Action) Discussion, Deliberation, and Possible Action to Make Recommendations to the Board Regarding Revisions to NAC Chapter 641 Provisions Related to the Practice of Supervision by a Psychologist.**

- A. NAC 641.1507
- B. NAC 641.1519
- C. NAC 641.152
- D. NAC 641.156
- E. NAC 641.157
- F. NAC 641.158
- G. NAC 641.159

This agenda item may include, but is not limited to, the discussion, deliberation, and possible action to make recommendations to the Board on the Committee's evaluation of whether any revisions to the qualifications and requirements for supervisors creates additional burdens on supervision or creates supervision scenarios not intended by those revisions.

Dr. Owens wanted to look at the year requirement versus CE requirement, and the number of students a supervisor can supervise. This was assigned to Dr. Paul who was going to be looking into what the university is doing. Accordingly, Dr. Paul should have an update at the next meeting.

The Committee looked at R074-18, NAC 641.1519, § b – training and clinical supervision – if the Committee wants to delete § 2 and not have the 3-year requirement, then § b needs to be more robust. Dr. Owens believes there was proposed language to include supervision of supervision. Dr. Benuto indicated the university generally has a senior student shepherding a junior student. For instance, a third-year student may start working with a younger student to work through specific models. According to Dr. Benuto students generally stay for three (3) years if they are developing competencies, which allows them to retain the role and continue doing supervision. Dr. O'Donohue thought the language revolved around supervising the supervisor, but Dr. Benuto clarified that it

is the supervisor is the one supervising the student. The point Dr. Benuto was making was that the training supervision can span longer than a year. Dr. O'Donohue did not understand why the Board would have to legislate it. Dr. Owens responded that the Board does not have to legislate it, but pointed out that the supervisor does have to meet at least one of the following criteria to be a supervisor: continuing education, coursework, independent study, supervision of supervision, etc.

Dr. Owens shared that her supervision of supervision was during a semester of her internship year which makes her think about how much can be earned in a semester at minimum. Her thought was that the number is likely 12-15 units. Dr. Owens would like to ensure the CE requirements are not so low that people are allowed to go through the requirement too easily and are not in contrast to the other requirements. Dr. Owens specifies that APA accredited schools are not included in her concerns because their training and mentorship are excellent. She more so is concerned and discusses the institutions that are not APA accredited, which are not currently providing critical training, coursework, education, or other programs/internships to compare with the APA requirements.

According to Dr. Owens, MFT Board requires 30 hours for their supervisors to supervise.

Dr. O'Donohue questioned if the higher CEU requirement was only required for non-APA individuals. Dr. Owens responded that her proposal was more intended to be a "this or this" type mentality. She wants to ensure the requirements are substantial enough to be equivalent so that supervision is not deemed to begin after only two (2) or three (3) credits. Dr. O'Donohue questioned if a little bit in each category would suffice, or if over experience in one category can overtake other categories. He does state that currently through the university the supervisors are rated by students, which provides valuable feedback.

Dr. Owens confirms the MFT Supervisor and that they either have to go through the Supervisor Course their Board requires (30 hours) or they have to be fully licensed for at least three (3) years and provide a transcript of 45 hours of supervision course and evidence of 25 hours of supervised experience from mentor (supervision supervision). Dr. Owens does not believe with the training provided in the doctorate program that an individual would need the full 30 hours. Dr. Benuto wanted to confirm it was an "or" situation, which was confirmed.

Dr. O'Donohue was doubtful of the validity surrounding the substance of three (3) years of full licensing meeting any criteria to determine eligibility to be a supervisor. The time requirement does require other supervision training (course, experience) per Dr. Owens. Dr. Owens believes training should be a focus for the three (3) years, especially if the Committee allows supervision of supervision and coursework. She states the terms of CEUs should be similar to an hour-long course for a semester. Dr. O'Donohue indicated a semester is 16-17 weeks, which includes reading outside of the class and papers. It was clarified that the 15 hours would only be required one (1) time (not per annum).

Dr. Benuto stated that she struggles with the external learning requirements that exist. She said there is a lot of value in one educate oneself that surpasses some of the Continuing Education programs that are not high quality. She explained that she would be better off and better served by, i.e., reading a book like Dr. Paul recommended, and would like to see allowance for flexibility in that, as supervisors could gain a lot from different readings that exist that are not necessarily accredited CEUs (which do not always equate to quality).

Dr. Owens noted the idea of having those who do not quite meet the requirements in a clear-cut way go through an equivalency evaluation by the ATEAM. She said they already include courses of independent study, so they could allow for that and applicants could go to the ATEAM for that equivalency consideration. Dr. Owens agreed with Dr. Benuto, saying that she learns a lot from reading studies and books, but she worries about people just saying that they read a book without knowing that they actually did. She stated that the Board might be able to allow for independent study via a book and provide something like 1 or 2 credits, she just worries about people saying they can supervise because they said they read a book.

Dr. O'Donohue stated the same could be said about coursework. He would not be able to provide a transcript of the supervision courses he took. He would only be able to say it was covered in certain courses because he no longer has the syllabi and the professors are dead. The Board would either have to trust him or not count it.

Dr. Owens said this conversation shows why the Board has had such a difficult time figuring out these issues. They are not going to get it perfect, just trying to get the right touch. She stated that if they remove the 3 year requirement, she is flexible on 15 CEUs and is willing to go higher or a little lower, and if they allow that someone has not had the 15 hours of CEUs or coursework or supervised supervision, but they have had it in some of their coursework and they have read relevant materials and can demonstrate that, they can take it to the ATEAM if the Board is alright with having that additional ability.

Dr. O'Donohue agreed that if they are not going to register supervisors, this is how it should be adjudicated.

Dr. Owens stated that on the applications the executive director sends out to trainees, interns, and assistants, there is a section on the application that requires the supervisor to demonstrate what they have had in order to supervise. She thought that they might just add on that the supervisor has to submit evidence of it along with the application. For instance, if the supervisor identified on an application had 15 CEU hours, he or she would submit that at the time when student is registering with the board.

Dr. O'Donohue liked that idea, and asked how the Board would make clear what the cut is -- who is going to say whether or not it is enough and what remediation might be required. He noted that is going to be complex judgment and wondered how that gets done in a valid and reliable manner.

Dr. Owens stated that the Board has the Application Tracking Equivalency and Mobility (ATEAM) committee to evaluate when applicants come from non-APA accredited programs and from states whose requirements for licensure are not substantially similar to Nevada's. She said the ATEAM reviews applications from those candidates, so the Board could also have the ATEAM review applications from supervisors when the executive director looks at an application that is not clear cut in terms of the requirements and the applicant is cobbling together other things to establish the requirements about which the executive director is not quite clear.

Dr. O'Donohue liked that it could be a holistic judgment as opposed to an algorithm, and noted that they just had to be clear to the applicants on how those judgments are made, whether there is an appeal process, and that those judgment should be made with remediation that would more likely result in accepting the application. Dr. Owens thought there could be easier remediations. For example, if an applicant lists books or materials he or she has read that look good, the Board could request 5 more hours of CEUs that would get them to the requirements metric. Dr. O'Donohue said that approach is collegial and allows for flexibility for the different variants in the quality of applicants and their backgrounds.

Dr. Benuto said she would take a stab and writing that language for the next meeting if she could get the minutes so that she could have something to work from and a little prompt of what she is writing.

Dr. Owens stated that Dr. Paul is working on revisions to NAC 641.158. Director Arnold advised the agenda recognized this assignment under No. 5 and read the same (regarding whether any revisions to the qualifications and requirements for supervisors creates additional burdens on supervision or creates supervision scenarios not intended by those revisions). Dr. Owens supposed this should wait until Dr. Paul returns at the next meeting but suggests that everyone consider proposed language for the next meeting. The language is confusing, and Dr. Owens believes because there is a lack of robust workforce, the Board has individuals coming to request to supervise more supervisees, which makes it difficult to determine how someone can supervise more individuals. The Committee will wait until Dr. Paul can address this language at the next meeting.

Dr. Benuto thinks the language Dr. Paul is working on would be problematic for Nevada's program if it is applicable to all supervisees. Although she believes it is currently applicable to psychological trainees not all individuals being supervised. Dr. Owens states Dr. Paul should be determining what training makes sense on all levels and notes she

does not believe the universities are following this language anyway. It was proposed by Dr. Owens that in a training system like the university, this shouldn't apply because of the on-the-fly opportunities presented. The intent is more based around the single psychologist in the community attempting to supervise ten (10) post doctorates from non-accredited programs and taking on trainees and interns from those non-accredited supervisees preventing them from providing adequate supervision for one (1) let alone ten (10) trainees. Dr. Owens suggests the Committee should not regulate to the lowest common denominator and also not to the highest, which makes it tricky.

Dr. Paul should be looking at language from other jurisdictions, which Dr. Owens believes will be interesting to review. The Committee does not want to negatively impact the university training centers nor do they want to create a sense of student abuse. Dr. O'Donohue points out the mental health shortage in Nevada and his concern that the Committee should not include requirements that are constraining.

The discussion was held in abeyance for the next meeting.

**6. (For Possible Action) Discussion of Upcoming Meeting Dates for the Nevada Board of Psychological Examiners' Ad Hoc Committee to Consider Registration of Supervisors of Psychological Assistants, Psychological Interns, and Psychological Trainees.**

The next regularly scheduled meeting of the Committee is Wednesday, June 28, 2023, at 9:00 a.m.

**7. Public Comment** - Public comment is welcomed by the Committee and may be limited to three minutes per person at the discretion of the Committee Chair. Public comment will be allowed at the beginning and end of the meeting, as noted on the agenda. The Committee Chair may allow additional time to be given a speaker as time allows and in his sole discretion. Comments will not be restricted based on viewpoint. No action may be taken upon a matter raised under this item of the agenda until the matter itself has been specifically included on an agenda as an item upon which action may be taken (NRS 241.020)

There was no public comment at this time.

**8. (For Possible Action) Adjournment**

There being no further business before the Committee, Dr. Owens adjourned the meeting at 9:52 a.m.