In a counselor’s development, supervision is a necessary, important, integral part of the process of forming a professional counseling identity. Just as multiple counseling theories exist to provide a conceptual framework for the process, multiple supervision theories exist to help a supervisor understand how and why to structure the experience. Based on the work of Carl Rogers, a person-centered approach to supervision centers on two main themes: the process and the relationship (Rice, 1980). Throughout this manuscript, the themes of process and relationship as well as the fit of person-centered supervision within the confines of a counselor education program are explored. Although more literature is needed to further discuss operating from a person-centered perspective within counselor education, this theoretical approach provides enough support and flexibility to work as a guiding theory for supervisors within counselor education programs.

Keywords: person-centered, supervision, counselor education

Purpose of Supervision

Briefly defined, counseling supervision is a practice in which a more experienced counselor (i.e., the supervisor) oversees the work of a more
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A more tenured practitioner acting as supervisor and a more junior practitioner acting as a supervisee.

According to the ACA Code of Ethics (2014), supervisors are encouraged to establish meaningful, respectful professional relationships with their supervisees, in which supervisors can provide honest, helpful feedback to supervisees to encourage and facilitate professional growth. One of the primary roles of a supervisor is to monitor the clinical work of the supervisees, with careful attention paid to client welfare (ACA, 2014). Regular meetings between supervisors and supervisees should occur along with regular assessment and evaluation of supervisees’ clinical performance (ACA, 2014). Supervisors also act as gatekeepers, monitoring and ensuring that a supervisee’s knowledge, skills, and professional behavior meet required standards (ACA, 2014; CACREP, 2015). As gatekeepers, supervisors implement remediation plans to facilitate supervisee development to meet the standards and, if necessary, prevent supervisees from becoming professional counselors (ACA, 2014; CACREP, 2015).

Model of Supervision

Although supervision has the general purpose of a supervisor overseeing the professional development of a supervisee, many theoretical approaches to supervision exist in which a supervisor seeks to conceptualize and understand the process and guidelines of supervision. The goals, process, and content of supervision sessions are all guided by a supervisor’s theoretical approach to supervision (Hackney & Goodyear, 1984). As with counseling theories, a model of supervision provides a theoretical framework through which a supervisor can more wholly and deeply understand the supervision experience.

Many different models of supervision exist, ranging from models based on existing psychotherapeutic theoretical approaches (e.g., cognitive-behavioral, person-centered, or psychodynamic) to con-
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structivist models (e.g., a narrative or solution-focused approach) to developmental models like the integrated developmental model (IDM) or the life-span developmental model. The person-centered approach to supervision is based upon Carl Rogers’ person-centered counseling theory. However, unlike the counseling theory, the theoretical approach of person-centered supervision is not as well documented. Rogers discussed the process of supervision in an interview and stated that he considered the major goal of supervision to involve facilitating the development of supervisees as they grow their understanding of themselves and the therapeutic process (Goodyear, 1982, as cited in Hackney & Goodyear, 1984). Rogers also noted that counseling and supervision “exist on a continuum” (Goodyear, 1982, as cited in Hackney & Goodyear, 1984, p. 284) and share many parallels in goal and process (Hackney & Goodyear, 1984).

To better explore and understand the person-centered approach to supervision, Rice (1980) offered two main themes for the approach: the process and the relationship. She explained that these themes, which run throughout the literature on the person-centered approach, are at times overlapping and at other times contradictory to each other but are “always in a relationship of creative tension with each other” (Rice, 1980, p. 136).

A Theory of Process

In stark contrast to many other theoretical approaches to supervision, the person-centered approach emphasizes the personhood of the counselor/supervisee and the development of his or her therapeutic abilities rather than focusing on the individual concerns of clients (Lambers, 2013; Mearns, 1997; Merry, 2001). Instead of bringing the client as the focus of supervision, the counselor/supervisee brings herself to be the focus (Mearns, 1997). Although person-centered supervision does not concentrate on the client directly, the client is not excluded from supervision (Mearns, 1997). Because the client’s material will inevitably be filtered through the counselor/supervisee’s perception and will therefore be altered, this indirect client material is exchanged for the direct experience of the therapeutic relationship instead (Mearns, 1997). The person-centered supervisor structures the supervision around the supervisee’s experience of the client and of their sessions together to facilitate the process of professional development within the counselor. Mearns (1997) suggested questions such as “What do I feel in relation to this client?”, “Are there any blocks to my empathy with this client?”, and “What am I learning in relationship with this client” (p. 88) as appropriate ways to facilitate self-reflection for the counselor/supervisee during the supervision time.

The counselors/supervisees are seen through the understanding that in every therapeutic relationship they enter, they also carry their own personhood, self-concept, and conditions of worth (Merry, 2001). Thus, a person-centered supervisor is focused on facilitating a process wherein the supervisee can examine self and experiences so the supervisee can enter the therapeutic relationship more fully and congruently (Lambers, 2000). Villas-Boas Bowen (2002) stated that when therapists are not attuned to their own needs, fears, and other unconscious factors, these factors can negatively interfere with the client’s process. For this reason, Rogers delineated a major goal of supervision as helping supervisees grow in self-awareness, self-confidence, and understanding of the therapeutic process (Goodyear, 1982, as cited in Hackney & Goodyear, 1984).

Self-awareness. Self-awareness of conditions of worth and self-concept enter every therapeutic relationship the counselor/supervisee has (Merry, 2001). Because counselors inevitably enter therapeutic relationships with each client, they bring with them their personhood, including their experiences, biases, and internalized conditions of worth (Merry, 2001). Much like the issue of countertransference, a lack of self-awareness can inhibit or derail the client’s process (Villas-Boas Bowen, 2002). The process of
person-centered supervision therefore necessitates that as supervisors and supervisees review taped sessions, the supervisee is asked to identify moments of incongruence or interruption of a client’s process within sessions (Villas-Boas Bowen, 2002). With these moments identified, the person-centered supervisor can facilitate an exploration of the supervisee’s internal process (Villas-Boas Bowen, 2002).

Rogers admitted that this style of supervision is hard to differentiate from therapy, noting that “sometimes therapists starting in to discuss some of the problems they’re having with a client will look deeply into themselves and it’s straight therapy. Sometimes it is more concerned with problems of the relationship and that is clearly supervision” (Goodyear, 1982, as cited in Hackney & Goodyear, 1984, p. 284). Admittedly, the process of person-centered supervision can at times look and feel like counseling; nevertheless, other person-centered supervision theorists have drawn clearer boundaries to distinguish the two interventions. Patterson (1964) implied that to conduct counseling with a supervisee is to force counseling on a “captive client” (p. 48). In other words, counseling with a supervisee is unfair and unethical because the supervisee does not possess the autonomy to consent to treatment. Unlike counseling, which gives clients the absolute freedom to process any and all parts of their experiences, supervision is focused on the supervisee’s experiences only as they arise within the therapeutic relationship with a client (Lambers, 2013; Villas-Boas Bowen, 2002). While supervision can produce personal growth within the supervisee, the focus of supervision remains the development of the supervisee to build and maintain congruent, empathic therapeutic relationships with clients (Merry, 2001). Worrall (2001) went so far as to state that effective supervision will result in the personal development of the supervisee even though the personal development is not the intended purpose of the supervision experience.

Locus of evaluation. Person-centered supervisors also have the goal of helping supervisees develop a more internal locus of evaluation (Patterson, 1983). As supervisees become more aware of how they interact with and are affected by clients, the self-awareness they gain can develop into an ability for supervisees to learn to judge their own counseling skills and sessions (Villas-Boas Bowen, 2002). Merry (2001) related the locus of evaluation to a person’s degree of incongruence: The more that people are incongruent, the more they need external validation or evaluation from others because they do not feel as if their own internal organismic valuing processes can be trusted. This external locus of evaluation creates a dependency on others to always provide guidance or appraisal on the counseling skills and performance of the supervisee (Merry, 2001).

In the United States, supervision within counseling is not a lifelong process. After completing the state-mandated hours of direct and indirect client contact, a supervisee graduates to full licensure status, and they are no longer required to participate in supervision. Without required ongoing supervision, it becomes imperative that supervisees develop an internal locus of evaluation to accurately and successfully determine their own effectiveness as a therapist.

Individual differences. The attitude of respect for individual differences between the supervisor and supervisee is related to the development of the internal locus of evaluation. Villas-Boas Bowen (2002) argued that supervisees will inherently have their own style of working in counseling, and supervisors should respect individual style differences. Just as a counselor does not work to mold a client to operate how the counselor would operate but rather respects the self-direction of the client in a person-centered counseling approach, so too does a person-centered supervisor trust a supervisee’s capacity for self-direction (Villas-Boas Bowen, 2002).

Hackney and Goodyear (1984) stated that person-centered supervisors do not impose their own styles upon supervisees to mold the supervisees into
“pale versions of the supervisor” (p. 294). Rogers also showed support for allowing supervisees to develop their own personal counseling styles when he expressed a belief that counselors engage in the counseling process in the best way they can in that present moment (Goodyear, 1982, as cited in Hackney & Goodyear, 1984; Rogers, 1956). Furthermore, in a taped recording of a mock supervision session, Rogers offered his perspectives of the supervisee’s counseling session and concluded by saying, “You realize I’m saying what I would do, and that doesn’t mean it’s necessarily what you should do” (Goodyear, 1982, as cited in Hackney & Goodyear, 1984, p. 291). Rarely does a person-centered supervisor suggest only one correct response or way of interacting within the therapeutic relationship (Patterson, 1983).

A Theory of Relationship

In addition to representing a theory of process, the person-centered approach to supervision is also a theory of relationship (Rice, 1980). The importance of the supervisory relationship to the successful supervision experience is supported throughout the research literature (Ellis, 1991; Ladany, Mori, & Mehr, 2013; Ramos-Sánchez et al., 2002; Ronnestad & Skovholt, 1993). From a person-centered approach, movement, change, and professional development are rooted in the supervisory relationship. A supervisee can use the supervision relationship to explore therapeutic concerns much like a client can use the therapeutic relationship to explore personal concerns (Rogers, 1956). The core conditions of congruence, empathy, and acceptance are all necessary to the person-centered supervision approach (Hackney & Goodyear, 1984; Lambers, 2000, 2013; Villas-Boas Bowen, 2002).

Empathy. Worrall (2001) believed the only way for supervisors to learn about their supervisees was to listen empathically as the supervisees share their experiences. The importance of listening in person-centered supervision cannot be overstated. Patterson (1964) indicated that a supervisor should strive to listen to the experiences and perceptions of the supervisee rather than lecture. Rogers also emphasized that being understood can help supervisees from any theoretical orientation feel more open to exploring some of their hardships in counseling and therefore help them grow in their professional development; teaching in supervision, he stated, must happen with more subtlety (Goodyear, 1982, as cited in Hackney & Goodyear, 1984). Empathy in the person-centered approach extends to all the parts of the supervisee, including thoughts, feelings, ethical concerns, and theoretical concerns (Lambers, 2000). However, Lambers (2000) remarked that the responsibility of judgment or evaluation for a supervisor may inhibit the ability to offer deep empathic understanding.

Acceptance. Acceptance in person-centered supervision looks like full engagement in the supervision process (Lambers, 2000), but congruence also demands that the supervisor acknowledge and own the responsibilities that come with the role (Bryant-Jeffries, 2005). These responsibilities, which include issues of evaluation and gatekeeping, will be discussed later.
supervision implies a prizing or valuing of the supervisee (Hackney & Goodyear, 1984; Lambers, 2000). Lambers (2000) posited that the combination of experiencing empathy and acceptance, or unconditional positive regard, moves a supervisee towards congruence. As previously mentioned, the person-centered approach to supervision values the individual differences of the supervisee and accepts that supervisees are free to develop their own styles of counseling that fit best for them (Hackney & Goodyear, 1984; Rogers, 1956; Villas-Boas Bowen, 2002).

Lambers (2000) considered the differences between a person-centered approach to supervision and counseling to be most visible with regard to acceptance. Whereas the unconditional positive regard within counseling is devoid of an evaluative attitude (Rogers, 1957), in supervision there is an expectation of evaluation, which gives a supervisor the freedom to challenge a supervisee (Lambers, 2000). Nevertheless, the person-centered approach operates from a potentiality model: The supervisor offers acceptance of supervisees and their processes and trusts the supervisees’ potential for growth (Lambers, 2013).

A Person-Centered Approach Within Counselor Education

CACREP (2015) set guidelines for the supervision of counselors-in-training, which include the necessity of reviewing recorded sessions or conducting live supervision in addition to providing formative and summative evaluation assessments of the counselor-in-training’s performance. CACREP (2015) also acknowledged the ethical responsibility of supervisors to act as gatekeepers and remediate or dismiss counselors-in-training whose skills, performance, or professional conduct fall below the standard requirements. Moreover, the Association for Counselor Education and Supervision (ACES, 2011) recognized the importance of infusing multicultural considerations into supervision, facilitating growth in multicultural competence for supervisees, and adhering to the ACA’s ethical guidelines and legal guidelines set by the state as best practices for supervision. The responsibilities of a supervisor to evaluate, remediate, and act as a gatekeeper; adhere to ethical and legal standards; and promote multicultural competence will now be discussed from a person-centered approach to supervision.

Evaluation

Even though person-centered supervisors trust in the potentiality for their supervisees to grow, evaluation remains a necessary responsibility of a supervisor who oversees counselors-in-training (ACA, 2014; ACES, 2011; CACREP, 2015). As previously mentioned, Lambers (2000) proposed that evaluation can hinder a supervisor’s ability to offer full empathic understanding. Nevertheless, evaluation is and should remain a necessary part of supervision (Patterson, 1964). Evaluation can be conducted in a manner consistent with a person-centered philosophy. With congruence and transparency in mind, Patterson (1964, 1983) recommended that criteria for evaluation are clearly explained to supervisees at the start of supervision. The explanation of evaluation can be accomplished through a collaborative discussion that allows the supervisee to explore personal goals and discuss expectations. In addition, any formal evaluation procedures discussed are associated with any course requirements. Bernard and Goodyear (2018) suggested the use of a supervision contract that allows the supervisor to address the evaluation process.

While evaluating supervisees, person-centered supervisors are also advised to strive to maintain their acceptance of supervisees (Lambers, 2000). Rogers mentioned that he worked to avoid criticism (Goodyear, 1982, as cited in Hackney & Goodyear, 1984) since judgment and critical confrontation tend to inhibit the openness of the supervisee from processing the experience (Lambers, 2000). When Rogers (1957) described unconditional positive regard, he stated that it was a full prizing of a client and defined the term as
acceptance of all the client’s feelings, even those that are “negative, ‘bad,’ painful, fearful, defensive, [and] abnormal” (p. 98). Because Rogers (1957) deemed that some clients’ feelings or behaviors may be abnormal, unconditional positive regard can be understood as a prizing or acceptance of the person sometimes despite their actions or behaviors. In the context of supervision, unconditional positive regard means the supervisor works to accept their supervisees as individuals worthy of acceptance without conditions, but all their actions are not deemed acceptable. In this light, unconditional positive regard gives the supervisor the freedom to evaluate as needed in supervision: The supervisor works to accept the person while upholding the responsibility to the counseling profession and to clients to evaluate and facilitate professional growth for supervisees.

As previously discussed, a person-centered supervisor also works to facilitate the development of an internal locus of evaluation within the supervisee (Merry, 2001; Patterson, 1983; Villas-Boas Bowen, 2002). Thus, even as a supervisor has the responsibility to evaluate a supervisee, the person-centered supervisor also continues to help supervisees thoughtfully and accurately evaluate their own performances within their therapeutic interactions.

Gatekeeping

Gatekeeping can be defined as an ongoing process in which counselor educators intervene when counselors-in-training are not making sufficient progress towards acquiring and demonstrating the knowledge, skill, and professional dispositions necessary to become a competent professional counselor (CACREP, 2015; Freeman, Garner, Fairgrieve, & Pitts, 2016). Gatekeeping entails the ongoing process of not only evaluating counselors-in-training but also implementing plans for remediation, retention, or dismissal from a program when necessary. According to some authors, remediation and gatekeeping can best be understood as a part of the ongoing process of facilitating professional development and growth for counselors-in-training (Freeman et al., 2016).

A person-centered approach to supervision is certainly rooted in a potentiality model (Lambers, 2013), yet the role of gatekeeper is still a required responsibility of a person-centered supervisor. While some authors have mentioned additional readings (Patterson, 1983) and individual counseling (Rogers, 1956) as strategies to further the professional development of counselors-in-training, other person-centered theorists have hypothesized that by continuing to offer a consistent, accepting relationship, the supervisee will be free to continue professional development (Lambers, 2000, 2013). The responsibility of gatekeeping as a person-centered supervisor goes beyond maintaining an accepting relationship.

Rogers (1961) described the self-actualizing tendency as an innate urge to develop, grow, and move forward. According to Rogers (1961), the self-actualizing tendency sometimes lies latent due to incongruence and conditions of worth, but given the right relationship, a person can experience the freedom to re-engage the tendency and move towards congruence. This congruence is identified as dropping masks and unfitting roles and becoming more truly oneself (Rogers, 1961). Judging from this explanation, these authors believe the self-actualizing tendency and the potentiality model of person-centered supervision do not conflict with the responsibility of gatekeeping. Through supervision, supervisors believe and trust in their supervisees’ potential to become more fully themselves, but does this mean who they are is necessarily a professional counselor? As a person-centered supervisor, one strives to maintain acceptance and congruence so supervisees can move towards their own congruence. If the necessary relational conditions are provided, supervisees can be free to move towards a more authentic way of being. However, supervisees sometimes demonstrate professional development at a slower rate than necessary to meet expected requirements. As a gatekeeper and per-
Dual relationships, including intimate or sexual relationships and practicing as both a counselor and a supervisor for the same individual, are also of ethical concern (ACA, 2014). As previously addressed, even though the person-centered supervision experience can often parallel a counseling experience, it is still critical that a person-centered supervisor distinguishes between the two roles. Patterson (1964) concluded that to engage in counseling with a supervisee is unethical and unfair because the supervisee is a “captive client” (p. 48) who cannot therefore give proper consent to the counseling relationship. Lambers (2013) characterized the ethics of person-centered supervision as foundationally holding a deep respect for the autonomy and psychological freedom of the supervisee. Because a supervisor inherently has power over a supervisee due to the evaluative nature of supervision, entering a sexual relationship with a supervisee would be a violation of the supervisee’s right of autonomy and freedom.

Multicultural Concerns

According to the best practices of supervision put forth by ACES (2011), multicultural considerations extend to the supervisor infusing multicultural topics into supervision and encouraging the supervisee to address multicultural concerns with clients. The person-centered approach to supervision does not directly address working from a multicultural framework or facilitating growth in multicultural competence in supervisees. Neither Rogers nor other authors have discussed the importance of attending to cultural factors, including race, ethnicity, gender, sexual orientation, socioeconomic status, ability, privilege, spirituality/religion, and language. Nevertheless, person-centered supervisors hold a deep respect for individual differences and do not impose their own attitudes, beliefs, or styles onto supervisees (Hackney & Goodyear, 1984; Patterson, 1983; Villas-Boas Bowen, 2002). In this manner, a person-centered approach gives room for supervisors to examine, acknowledge,
and discuss their own biases and experiences of privilege and oppression as well as those of supervisees. The empathy and acceptance stressed in person-centered supervision can also create a safe environment in which supervisors and supervisees can process multicultural concerns as they arise in supervisory and therapeutic relationships.

**Case Example**

Viviana was a beginning practicum student. She had completed clinical classes in which she had the opportunity to practice her counseling skills through roleplays with her fellow students and participate in supervision. Upon meeting Viviana, her supervisor took time to explain her process and approach to supervision with Viviana. Along with the expectations, the supervisor stressed the importance of building a strong supervisory relationship. The supervisor explained her belief that providing Viviana with empathy and acceptance would create more space for positive, professional growth to occur over the practicum course. Viviana shared her past experiences of supervision and concurred that she found herself more open to feedback and more willing to take risks towards growth when she felt her supervisor accepted and understood her.

As Viviana began counseling her initial community clients in practicum, her supervisor watched the sessions and observed Viviana’s discomfort when her clients began to outwardly express emotions. During triadic supervision, the supervisor broached the topic of Viviana’s discomfort. Viviana shared that in her family’s culture, publicly or outwardly expressing emotions was considered a sign of weak character. The supervisor wondered aloud what it would mean to be a weak counselor or an emotional counselor; she asked Viviana to reflect on the questions throughout the week.

As the semester progressed, Viviana continued processing her beliefs about outwardly expressing emotions with her supervisor. The supervisor listened with empathy and reflected that Viviana’s internal fears kept her from connecting with her clients on a deeper, more emotional level. The supervisor expressed her own sadness, sharing that she could see that Viviana wanted to connect more deeply with her clients and that Viviana seemed to feel trapped. Viviana began to get teary-eyed. She explained that she had felt limited by her family from truly embracing her own feelings and expressing herself in an authentic way, and she stated that she did not want her clients to feel limited in what they perceived as acceptable to share with her as their counselor.

During the mid-term evaluations, the supervisor provided Viviana with concrete feedback on her counseling skills. The supervisor brought attention to Viviana’s strengths and needed areas of growth. Nevertheless, her supervisor authentically expressed her belief in Viviana’s potential to successfully demonstrate the level of counseling skill necessary to pass her practicum. Viviana shared that she believed the supervisor, citing their supervisory relationship as a genuine experience of positive regard.

Viviana was actively engaged throughout the process of supervision and remained in psychological contact with her supervisor. Because of her skills, openness to feedback, and commitment to self-awareness and self-evaluation, Viviana successfully progressed through her practicum experience. However, not all supervisees will present with such openness or will be as engaged in the process. A supervisor who identifies and works from a person-centered approach may wish to consider the supervisory alliance and evaluate how the relationship can be strengthened to better facilitate the professional development of the supervisee. Person-centered supervisors can therefore reflect on their own levels of congruence, empathy, and acceptance that are communicated to their supervisees. If concerns persist, the supervisor can further implement a competency plan that would provide the supervisee with active steps to take to develop neces-
sary counseling skills and meet course requirements.

Conclusion

Rogers (1956) argued that experiential learning was a critical part of training for professional counselors. However, this experiential learning should be overseen by a more experienced or senior counselor, thus making supervision a necessary, integral part of counselor education. An effective supervisor can help facilitate the professional growth of counselors-in-training.

Many different theories of supervision exist that provide guidance for understanding the roles and responsibilities of a supervisor and supervisee as well as the process of supervision. In the person-centered approach to supervision, two themes provide a framework: the theory as a process and the theory as a relationship (Rice, 1980). The themes of person-centered supervision fit within the confines of a counselor education program. Although more literature is needed to further discuss operating from a person-centered perspective within counselor education, this theoretical approach provides enough support and flexibility to work as a guiding theory for supervisors of counselors-in-training.

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