



## LICENSING ALERT 04-2023

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June 14, 2023

**Effective Date:** Immediately

**Subject:** [28 Pa. Code § 704.12](#). Full-time equivalent (FTE) maximum client/counselor ratios.

**Purpose:** To provide clarification on how to calculate client to counselor ratios for inpatient nonhospital treatment and rehabilitation facilities for regulatory compliance.

**Background:** The Department of Drug and Alcohol Programs (DDAP) has received requests from inpatient nonhospital treatment and rehabilitation facilities for technical assistance on how to calculate client to counselor ratios for under licensing regulations, specifically, 28 Pa. Code § 704.12 (a)(3)-(4).

[28 Pa. Code § 704.7](#) specifies the qualifications for a counselor. Under § 704.12, all facility staff on site who meet the qualifications for a counselor and who provide clinical services to clients can be included for calculation of the client to counselor ratio. This allows the time that project directors, facility directors and clinical supervisors spend providing clinical services to be included in calculating the client to counselor ratio. For purposes of this calculation, clinical services include specialized substance use disorder services, such as counseling, assessment, group therapy, family therapy, medication management, and other treatments. Additional services that can be included in the number of hours dedicated to clients are clinical documentation, grievance reviews/appeals, case consultations, referrals, treatment team meetings, psychoeducation, behavioral interventions, conflict resolution/mediation and client follow-ups. Clinical services do not include administrative duties such as the business functions related to the operation of the facility such as program development, ordering supplies, maintenance, and repairs to the facility, attending non-clinical meetings like program planning or funding, generating payroll, developing staff schedules, and all other non-client related tasks.

Ratio calculations are based on time spent with individuals providing clinical services, not based on each individual counselor's caseload. Facility staff who provide counseling and clinical services in inpatient nonhospital treatment and rehabilitation facilities are not required to carry a defined caseload to be included in the client to counselor ratios. Any individual staff person who meets the education and experience requirements for the position of counselor under § 704.7(b) can be included in the client to counselor ratios for the time they spend providing clinical

services. Within the inpatient nonhospital residential treatment and rehabilitation facilities there are multiple position descriptions such as facility director, clinical supervisors, intake assessors, aftercare coordinators, or others, that may meet the qualifications for a counselor but do not hold that position title. If an individual is providing clinical services, they can be listed on the qualifications page of the Staffing Requirements Facility Summary Report and counted towards the client ratios. It is recommended that facilities document time spent delivering clinical services as it occurs for accessibility and reference in completing the Staffing Requirements Facility Summary Report.

**The formula for determining the client to counselor ratio:**

1. The Full Time Equivalent (FTE) is determined by adding the total number of hours of clinical services provided to clients by all “qualified counselors,” which is divided by the facility's standard workweek hours.
  - a.  $\text{All Clinical Hours} \div \text{Facility's Standard Workweek Hours} = \text{FTE}$
2. To determine the ratio, the total number of clients is divided by the FTE.
  - a.  $\text{Client Census} \div \text{FTE} = \text{Ratio}$

Example:

- $120 \text{ Clinical Hours} \div 40\text{-hour Workweek} = 3 \text{ FTE}$
- $24 \text{ Clients} \div 3 \text{ FTE} = 8:1 \text{ Ratio}$

See the example listed on page 3 for how to input the number of active hours dedicated to clients.

Please submit all questions regarding this Licensing Alert to the Bureau of Program Licensure at [RA-licensuredivision@pa.gov](mailto:RA-licensuredivision@pa.gov).

