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Psychologists' judgements of professional appropriateness of sexual relationships with former supervisees

Woodburn, Judy Ronan, Ph.D.

The Ohio State University, 1993

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PSYCHOLOGISTS’ JUDGEMENTS OF PROFESSIONAL APPROPRIATENESS OF SEXUAL RELATIONSHIPS WITH FORMER SUPERVISEES

DISSERTATION

Presented in Partial Fulfillment of the Requirements for the Degree Doctor of Philosophy in the Graduate School of The Ohio State University

By

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* * * * *

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CHAPTER I
INTRODUCTION

One of the many controversial issues in the field of mental health is that of dual relationships. Helping professionals enter into a dual relationship whenever they have another, significantly different relationship with a client, student, or supervisee. When helping professionals become involved in dual relationships, the potential exists for a conflict of interest and for exploiting those individuals who seek professional help. The helping professions have become increasingly concerned about dual relationships as an ethical issue. Kitchener (1988) asserts that all types of dual role relationships, not just those involving sexual contact, may be ethically problematic. However, throughout the 1980s, sexual dual relationships, especially therapist-client sexual relationships, received a great deal of attention in the professional literature and in the popular media, and they continue to be controversial. Dual relationships are rarely a clear-cut matter. Often, judgment calls and careful interpretation and application of ethical codes to specific situations are needed. Dual relationships often are extremely complex and ambiguous, and
they can be problematic along a number of dimensions (Herlihy & Corey, 1992). First, dual relationships are pervasive in that they exist throughout the helping professions. A broad array of issues present themselves. For example, bartering with a client for goods or services, counseling a friend or acquaintance, socializing with a former client, counseling a student, or having a sexual relationship with a former client or supervisee. Dual relationship issues confront psychologists in diverse roles, including counselor, educator, supervisor, and consultant. No professional remains untouched by the potential difficulties inherent in dual relationships. Second, dual relationships can be difficult to recognize and can evolve in extremely subtle ways. This is particularly true when they are sequential rather than simultaneous. Yet, according to Pope and Vasquez (1991, p. 112), "the mere fact that the two roles are apparently sequential rather than clearly concurrent does not, in and of itself, mean that the two relationships do not constitute a dual relationship."

This issue raises questions about what types of post-therapy or post-supervision relationships, if any, are acceptable. Third, dual relationships are sometimes unavoidable. Relationships that involve some blending of roles may be inevitable. For example, counselor educators may serve as teachers, as counselors, as researchers, as supervisors, and as evaluators, either sequentially or simultaneously. There
always is the possibility that this role blending can present ethical dilemmas involving conflicts of interest or impaired judgment. One of the primary difficulties associated with dual relationships is the lack of clear-cut boundaries between roles. For example, how can a supervisor work effectively without addressing the supervisee's personal concerns that may be impeding the supervisee's performance? It seems as though superhuman wisdom would be required to know exactly the point at which the line is crossed in every instance, and to know it in time to avoid it. Fourth, though the potential for harm almost always exists at the time the dual relationship is entered, the outcome of a dual relationship is not always harmful; there can be some positive aspects to the combining of roles (Herlihy & Corey, 1992). The possible outcomes to dual relationships form a continuum which ranges from those that are clearly exploitative and harmful to the helpee, to those that are benign and result in no harm or help, to those that are very helpful or beneficial to the helpee. However, the assertion that some dual relationships are beneficial and that they are not always avoidable is not universally shared. For example, Pope and Vasquez (1991) argue that helping professionals who claim that dual relationships are beneficial for the helpee and/or that dual relationships are unavoidable may be justifying or rationalizing inappropriate behavior, avoiding responsibility, or failing to explore and
create acceptable alternative approaches. Pope and Vasquez (1991) also assert that there is virtually no research evidence to support the hypothesis that dual relationships are a safe and effective means to produce therapeutic change. Fifth, dual relationships are the subject of conflicting advice. Though virtually all codes of ethics prohibit or warn against dual relationships, experts disagree as to how these codes should be interpreted. Some helping professionals believe that ethical codes should be viewed as guidelines to practice rather than as rigid prescriptions, and that professional judgment must play a crucial role. Others in the helping professions take a more "conservative" stance, arguing that ethical codes would be pointless if left to individual interpretation. Some professionals even argue that allowing individual interpretation of codes of ethics invites professionals to justify whatever behaviors they are tempted to perform out of self-interest.

Furthermore, the potential for harm extends beyond just the individuals directly involved in the dual relationship (Herlihy & Corey, 1992). A primary concern is the risk of harm to the consumer of counseling services. A client who feels exploited by a dual relationship is bound to feel confused, hurt, isolated, angry, fearful, and betrayed. The result may be an erosion of trust that may have lasting
consequences. Clients also may be reluctant to seek help from other professionals in the future.

Helping professionals also need to be concerned with the potential harm to themselves, to other helpees or potential helpees, to the profession, and to the consumer.

According to Herlihy and Corey (1992), risks to the professional who becomes involved in a dual relationship include damage to the clinical relationship, loss of professional credibility, violations of ethical standards, revocation of license or certification, and risk of malpractice litigation. These risks are increased by factors such as role conflicts, the potential for impaired professional judgment, exploitation of clients or supervisees, specific legal or ethical prohibitions, and failure to seek consultation and/or supervision when the professional proceeds with the dual relationship. In 34 states, professional counselor licensure laws have been enacted to add the force of law to ethical sanctions. In addition, some states, such as Colorado, Minnesota, and Wisconsin, have enacted laws which make therapist-client (and in many cases therapist-former client) sexual activity a felony crime (Herlihy & Corey, 1992; Vasquez & Kitchener, 1988; Chapter 297 Minnesota Laws, 1985; Wisconsin Act 434, 1983).

Even when dual relationships go undetected and unreported, they have an effect on the professionals
involved, causing them to question their competence and diminishing their sense of moral selfhood (Herlihy & Corey, 1992). Repeated violations of any ethical standards result in further violations becoming easier to perform, and the result often is an impaired professional (Bok, 1979).

Dual relationships also can have effects on other consumers, especially in any relatively closed system, such as a college counseling center or a hospital, in which other clients have opportunities to be aware of the dual relationship. Other clients might resent that one client has been singled out for a special relationship. When a power differential is involved, as in supervisory relationships, the resentment may be coupled with a reluctance to question the dual relationship openly for fear of reprisal. Even independent practitioners who engage in dual relationships can suffer. Often, current and former clients are a major source of referrals. However, a client who has been involved in and harmed by a dual relationship is not likely to recommend the therapist to friends, relatives, or colleagues (Herlihy & Corey, 1992).

Fellow professionals who are aware of a dual relationship are placed in a difficult position. Confronting a colleague is always uncomfortable, but it is equally uncomfortable to condone the behavior through silence or inaction. Confronting dual relationships creates a distressing dilemma that can undermine the morale of any
agency or system in which it occurs. In addition, paraprofessionals or others who work in the system and who are less familiar with professional codes of ethics may be misled and develop an inaccurate impression regarding professional standards (Herlihy & Corey, 1992).

Finally, as Stadler (1986) has noted, the counseling profession itself is damaged by the unethical conduct of its members. Stadler (1986) asserted that the "profession is diminished in its own eyes and in the eyes of others when its members do not take their ethical responsibility seriously. The ensuing loss of morale, prestige, and credibility can produce any number of unwanted results and significantly alter the viability of the profession" (p. 138).

Members of the counseling profession have an obligation both to avoid causing harm in dual relationships and to act to prevent others from causing harm. Failure to assume these responsibilities results in erosion of professional credibility, reluctance of potential clients to seek counseling services, and fewer competent and ethical individuals entering training programs (Herlihy & Corey, 1992).

Clearly, dual relationship issues are extraordinarily subtle and extremely complex. However, sexual dual relationships are among the most serious of all ethical violations and remain the focus of most of the literature on
dual relationships. Today, there is clear agreement that sexual dual relationships with clients are unethical, and prohibitions against them have been codified into ethical standards and laws. The consequences for counselors who engage in sexual relationships with clients can be severe. They may have their licensure or certification revoked, be expelled from professional associations, be restricted in or lose their insurance coverage, be fired from their jobs, be sued in court, or be convicted of a felony (Vasquez & Kitchener, 1988). Supervisors of counselors who engage in sexual relationships with clients also are vulnerable to these consequences. According to the doctrine of "respondent superior," supervisors who are in a position of authority are responsible for acts of their trainees (Austin, Moline, & Williams, 1990).

Furthermore, interest in the issue of sexual dual relationships was fueled in 1990 by the proposals for revisions of the APA Ethical Principles of Psychologists (American Psychological Association [APA], 1990a, 1991) and the subsequently adopted Ethical Principles of Psychologists and Code of Conduct (Ethics Code) (APA, 1992). The new Ethics Code amended the guidelines to include a prohibition against sexual relationships with both current and former clients, but remained limited in scope, failing to address the issue of other types of dual relationships, such as
sexual relationships between supervisors and their former supervisees.

The Ethics Code (1992) also more specifically prohibits exploitative and sexual relationships with supervisees, but remains limited in scope in that sexual relationships with former supervisees are not specifically addressed. Given the accumulated information about therapist-client dual relationships and the parallels in the dynamics of therapist-client relationships and supervisor-supervisee relationships (Bartlett, 1983; Bernard, 1979; Borders and Leddick, 1987; Cormier & Bernard, 1982; Hart, 1982; Hess, 1980; Littrell, Lee-Borden, & Lorenz, 1979), additional research regarding supervisor-supervisee dual relationships is important.

The purpose of this study was to explore the incidence of sexual relationships between supervisors and former supervisees; the effects of time since termination of the supervisory relationship and who initiates the post-termination sexual relationship on psychologists' judgements of professional appropriateness of engaging in a sexual relationship with a former supervisee; the factors which influence judgements of appropriateness; and the relationship between previous sexual relationships with a supervisor or supervisee and judgements of professional appropriateness of engaging in a sexual relationship with a former supervisee.
CHAPTER II

LITERATURE REVIEW

Early Research on Dual Relationships

The initial information regarding dual relationships was based on studies with relatively large samples and was published by Masters and Johnson in Human Sexual Response (1966) and Human Sexual Inadequacy (1970). The data presented by Masters and Johnson (1966, 1970) focused on therapist-client dual relationships and formed the basis for five important observations. First, a relatively large number (exact numbers were not provided) of participants in the research reported sexual involvement with a prior therapist. Second, the majority of these reports were judged by the researchers to have actually occurred, as opposed to being fantasy. Masters and Johnson (1970) even argued that even if only one-fourth of the reports were accurate, the problem still would be significant for the profession. Third, the reports included every possible permutation of male or female therapist with male or female client, as well as group sex. Fourth, the most common combination was that of male therapist and female client. Fifth, extensive life history information was collected about each subject, enabling Masters and Johnson to conclude
that therapist-client sexual involvements were likely to have extremely negative effects on the client. In addition, Masters and Johnson provided an analysis of the imbalance of power in the therapeutic relationship and the necessity of trust, leading them to characterize the client as "essentially defenseless" (1970) to sexual exploitation by a therapist. These observations served to refocus the psychology profession on the issue of dual relationships.

Ethical Considerations

Recent and current ethical guidelines. The Ethical Principles of Psychologists (APA, 1990b) address the issue of dual relationships several ways. Principle 6a states:

Psychologists are continually cognizant of their own needs and of their potentially influential position vis-a-vis persons such as clients, students, and subordinates. Psychologists make every effort to avoid dual relationships that could impair their professional judgement or increase the risk of exploitation. Examples of such dual relationships include, but are not limited to, research with and treatment of employees, students, supervisees, close friends, or relatives. Sexual intimacies with clients are unethical (p. 393).

In addition, Principle 7d states:

Psychologists do not exploit their professional relationships with clients, supervisees, students,
employees, or research participants sexually or otherwise. Psychologists do not condone or engage in sexual harassment. Sexual harassment is defined as deliberate or repeated comments, gestures, or physical contacts of a sexual nature that are unwarranted by the recipient (p. 393).

Thus, the Ethical Principles (APA, 1990b) provide no formal ethical statements regarding the appropriateness of engaging in various relationships with former clients or former supervisees. This issue was brought to the attention of the APA membership by the Ethics Committee of the APA in their 1990 proposed revisions to the Ethical Principles (APA, 1990). The proposed revisions included a number of statements regarding dual relationships. Proposed Principle II.A.5 stated:

Psychologists avoid dual relationships that may impair their objectivity or create a conflict of interest. They avoid dual relationships that could impair their professional judgment or increase the risk of exploitation, such as sexual relationships with their current students, supervisees, or trainees. Engaging in either therapy or assessment of clients generally precludes social or business relationships with those clients (APA, 1990a, pp. 29-30).

Proposed Principle II.A.6 stated, "Psychologists do not engage in sexual intimacies with current or former
psychotherapy clients" (p. 30), and proposed Principle II.A.7 stated, "Psychologists do not exploit, sexually or otherwise, their professional relationships with clients, supervisees, students, employees, research participants, or others" (p. 30).

The code revision subcommittee of the APA Ethics Committee also proposed specific statements regarding sexual relationships with former clients, which appeared in the proposed revision of the Ethical Principles (APA, 1991). This revision proposed that engaging in sexual relationships with former clients be considered only under unusual circumstances and after a review of a number of factors, such as the amount of time since termination, the nature and duration of therapy, and the evaluation of the impact of such action on the client and others. The proposed Code also suggested that issues of "undermining public confidence" and "detering the public's use of needed services" as reasons for careful consideration of whether to engage in these relationships. Finally, the revision proposed, as one option, a "one-year post-therapy time" as a period during which therapists do not engage in sexual relationships with former clients. While these proposed revised principles addressed issues of dual relationships with former clients, the issue of dual relationships with former supervisees continued to be ignored.
In December 1992, the new Ethical Principles of Psychologists and Code of Conduct (Ethics Code) (APA) was published, and a number of changes have resulted, reflecting the ongoing refinement of the psychology profession's thinking about dual relationships. The recently adopted Ethical Principles of Psychologists and Code of Conduct (Ethics Code) (APA, 1992) included a number of statements regarding dual relationships. General Principle B: Integrity made a general statement that psychologists "avoid improper and potentially harmful dual relationships" (p. 1599). Principle E: Concern for Others' Welfare stated:

Psychologists seek to contribute to the welfare of those with whom they interact professionally. In their professional actions, psychologists weigh the welfare and rights of their patients or clients, students, supervisees, human research participants, and other affected persons, and the welfare of animal subjects of research. When conflicts occur among psychologists' obligations or concerns, they attempt to resolve these conflicts and to perform their roles in a responsible fashion that avoids or minimizes harm. Psychologists are sensitive to real and ascribed differences in power between themselves and others, and they do not exploit or mislead other people during or after professional relationships (p. 1600).
The Ethical Standards section of the Ethics Code expanded on the notion of dual relationships. Standard 1.17(a):

Multiple Relationships, explicitly stated:

In many communities and situations, it may not be feasible or reasonable for psychologists to avoid social or other nonprofessional contacts with persons such as patients, clients, students, supervisees, or research participants. Psychologists must always be sensitive to the potential harmful effects of other contacts on their work and on those persons with whom they deal. A psychologist refrains from entering into or promising another personal, scientific, professional, financial, or other relationship with such persons if it appears likely that such a relationship reasonably might impair the psychologist's objectivity or otherwise interfere with the psychologist's effectively performing his or her functions as a psychologist, or might harm or exploit the other party (p. 1601).

In a similar vein, Standard 1.19: Exploitative Relationships prohibited psychologists from exploiting "persons over whom they have supervisory, evaluative, or other authority such as students, supervisees, employees, research participants, and clients or patients" (p. 1602).

More specifically, Standard 4.05: Sexual Intimacies with Current Patients or Clients prohibited psychologists
from engaging in sexual intimacies with current patients or clients, while Standard 4.07: Sexual Intimacies With Former Therapy Patients prohibited psychologists from engaging in sexual intimacies with a former therapy patient or client for a minimum of two years after the termination of professional services. Furthermore, Standard 4.07(b) asserted that:

Because sexual intimacies with a former therapy patient or client are so frequently harmful to the patient or client, and because such intimacies undermine public confidence in the psychology profession and thereby deter the public's use of needed services, psychologists do not engage in sexual intimacies with former therapy patients and clients even after a two-year interval except in the most unusual circumstances. The psychologist who engages in such activity after the two years following cessation or termination of treatment bears the burden of demonstrating that there has been no exploitation, in light of all relevant factors, including (1) the amount of time that has passed since therapy terminated, (2) the nature and duration of the therapy, (3) the circumstances of termination, (4) the patient's or client's personal history, (5) the patient's or client's current mental status, (6) the likelihood of adverse impact on the patient or client and others, and (7) any statements or
actions made by the therapist during the course of therapy suggesting or inviting the possibility of a post-termination sexual or romantic relationship with the patient or client (p. 1605).

While the new Ethics Code (1992) provided important explication of guidelines regarding dual relationships, specifically proscribed sexual relationships with former patients or clients, and stated that the "fact that a given conduct is not specifically addressed by the Ethics Code does not mean that it is necessarily either ethical or unethical" (p. 1598), the issue of dual relationships with former supervisees continued to be neglected.

Legal Considerations

Early decisions. The increasing interest and concern regarding dual relationships may be due, in part, to the number of civil, licensing, and criminal statutes which have addressed this issue. Prior to the works of Masters and Johnson (1966, 1970), relatively little action was taken in cases of dual relationships. For instance, as late as 1965, the Colorado Supreme Court, in Colorado State Board of Medical Examiners v. Wailer (1965) blocked the board's efforts to revoke a therapist's license for allegedly formulating a treatment approach that included sexual intercourse between the therapist and client.

The cases of Zipkin v. Freeman, which was decided in 1968 by the Missouri Supreme Court, and Roy v. Hartogs,
decided in 1976 by the New York Appellate Court, the higher levels of the United States judicial system began to recognize therapist-client sex as the legitimate basis of tort or malpractice suits (Pope, 1986). However, the authority of licensing boards to take action regarding psychologist-client sexual relations was not upheld by the courts until the 1970's. For example, in 1973, the Kansas Supreme Court, in Morra v. State Board of Examiners of Psychologists (1973) recognized the board's right to revoke the license of a psychologist who had attempted to persuade two clients to engage in sexual activities with him, and a California Appellate Court, in Cooper v. Board of Medical Examiners (1975) affirmed the board's right to revoke a license predominately due to sexual intimacies between the therapist and three clients. Furthermore, prior to the publication of the 1977 revised Ethical Standards (American Psychological Association), which stated explicitly that "sexual intimacies with clients are unethical" (Principle 6a), psychologists who engaged in sexual intimacies were found by the Committee to have violated other aspects of the ethics code. Thus, only in the last decade or two have the American Psychological Association, the licensing boards, and the civil courts taken action to focus attention on the issue of dual relationships.

Incidence and trends. More recently, additional studies have added to our knowledge about the incidence of
dual relationships and the trends in ethics cases. Sell, Gottlieb, and Schoenfeld (1986) mailed a survey to the chairs of ethics committees and executive secretaries of the state boards of all 50 states, the District of Columbia, Puerto Rico, and the Canadian Provinces of British Columbia and Nova Scotia during 1984. The response rate was quite high (83.6% for the ethics committee; 71% for the state boards) and very nearly approximated the population surveyed. A number of interesting findings were reported. First, the number of complaints of sexual impropriety filed against psychologists increased substantially between 1982 and 1983. For ethics committees, the percentage of increase was 67%, and for state boards, the percentage increase was 141%. Ethics committees reported findings of violations in 48% of cases in 1982 and in 36% of cases in 1983. State boards reported findings of violations in 76% of cases in 1982 and 46% in 1983. Of the psychologists found in violation by Ethics committees in 1982, 67% were involved with current clients; in 1983, 58% of the violations were in cases involving current clients. Corresponding data for the state boards were 62% for 1982 and 68% for 1983. Interestingly, psychologists were found to be in violation even when they claimed that the therapeutic relationship had already been terminated. Of all psychologists found to be in violations by ethics committees, 13% in 1982 and 37% in 1983 alleged posttreatment inception of the relationship.
Psychologists used this defense in 23% of cases in which they were found to be in violation by state boards in 1982 and in 11% of such cases in 1983. These results indicate that, according to the complaints that were most frequently filed, the sexual impropriety had occurred during treatment. Interestingly, of the 76 complaints against psychologists charged with sexual relationships with current clients, 55% (n=42) were found in violation. However, of the 20 cases in which psychologists alleged that the therapeutic relationship had been terminated before the onset of the sexual relationship, 70% (n=14) were found in violation. Thus, findings of violation were higher when psychologists alleged that the therapeutic relationship had already terminated. Notably, no state board or ethics committee had dismissed a single complaint against a psychologist solely because a sufficient amount of time had elapsed since termination of treatment.

Sell, Gottlieb, and Schoenfeld (1986) also reported that very few committees and state boards had developed guidelines to determine whether sexual relationships between psychologists and former clients would be permissible. One state board had a guideline of longer than one year, two ethics committees and one state board had a formal waiting period of one year, and one ethics committee made an informal assumption of a 6-month waiting period. One ethics committee reported that its members did not necessarily
consider social relationships with former clients unethical, but did consider such relationships to be unsound.

A few years later, Gottlieb, Sell, and Schoenfeld (1988) expanded and refined their 1986 study and again surveyed the executive secretaries of the state boards of all 50 states, the District of Columbia, Puerto Rico, and nine Canadian provinces. Again, the return rate was high (79%) and very nearly approximated the population surveyed. A number of important findings were reported. First, the total number of complaints of sexual impropriety was 58 for 1984 and 82 for 1985, representing a 41.4% increase. When compared with the 17 complaints filed in 1982, the 82 complaints filed in 1985 represent a 482.4% increase over 4 years. An important note is that the 17 complaints in 1982 were reported by 42 respondents, while the 82 complaints in 1985 were reported by 48 respondents, and the 482.4% increase over the 4 years cannot be accounted for solely by the addition of 6 respondents to the survey. Second, the findings revealed that, in 1984, 37.9% (22) of complaints filed led to findings of violation, and in 1985, the percentage fell to 20.7% (17). This represents a substantial decrease over the previous study in that the percentages of psychologists found in violation were 76% (11) and 46% (13) for 1982 and 1983, respectively. Likewise, the percentages of psychologists found not in violation were 17.2% (10) in 1984 and 8.5% (7) in 1985,
representing a decrease from the previous study. However, the reductions in both categories may be explained by the dramatic increase in the number of cases that were pending when the survey was received. Third, none of the state boards reported cases in which a psychologist, having admitted to a sexual impropriety with a former client, was found not in violation because the relationship had been initiated after a sufficient amount of time had elapsed after termination. Fourth, none of the state boards took a position which allowed a sexual relationship between a psychologist and a client after a specified time had elapsed after termination. Only two state boards reported that they used guidelines other than or in addition to time in order to determine whether a given sexual relationship would be allowed. One state board reported working on an ad hoc basis, and one reported that the state board seriously cautioned psychologists about to begin such a relationship regarding the potential consequences. Thus, there was no statute of limitations regarding sexual relations with former clients. Fifth, in 1984, only 4.7% (2) of the state boards reported having received complaints alleging sexual impropriety occurring within a professional but non-therapeutic relationship; in 1985, the incidence of such complaints increased to 11.4% (5). Finally, in 1984, 15.8% (6) of respondents reported having received complaints
alleging abuse of the therapeutic relationship in nonsexual ways, while in 1985, the incidence rose to 23.1% (9).

In 1988, the Ethics Committee of the American Psychological Association reported that, over the previous five years, almost one-fourth (23%) of the violations involved Principle 6a (dual relationships, including sexual intimacies with clients), and the most frequent type of dual relationship reviewed by the Committee was sexual intimacy between therapist and client. In the Report of the Ethics Committee, 1989 and 1990 (Ethics Committee of the APA, 1991), little seems to have changed. The most frequent reason for complaints being filed continues to be the category which includes "sexual intimacy with client/dual-relationship/exploitation of others and/or sexual harassment" (p. 752). This category was cited by complaints in 24% of the cases opened in 1989 and 35% of the cases in 1990. When the multiple categories per case are included, the percentages increase to 35% and 41% of the cases, in 1989 and 1990, respectively. Information about the adjudications of these cases is not available as of this writing.

The Sell, Gottlieb, and Schoenfeld (1986) and Gottlieb, Sell, and Schoenfeld (1988) studies highlighted the lack of a statute of limitations regarding sexual relations with former clients, as well as the fact that state boards were deciding that a psychologist could be held liable for his or
her actions long after terminating a therapeutic relationship and that, in such matters, the therapeutic relationship may be assumed to be endless. Some states have followed this reasoning. Currently, professional counselor licensure laws have been enacted in 34 states and add the force of law to ethical sanctions (Herlihy & Corey, 1992).

For example, Florida Administrative Code, Section 21U-15.004(5)(a) (1986), states, "For purposes of determining the existence of sexual misconduct as defined herein, the psychologist-client relationship is deemed to continue in perpetuity" and provides for clients to recover damages from sexual intimacies with therapists at any time during psychotherapy or after termination. Other states have defined a more delimited time period for recovery of damages as a client, but always for at least a one-year period post-termination. For example, Texas law states that a counselor shall not engage in sexual contact or intimacies with any current client or individual who has been a client within the past 2 years (Texas State Board of Examiners of Professional Counselors, 1990). California allows for a client to recover damages from a therapist who engages in sexual contact with that client "within two years following psychotherapy" (Civil Code section 43.93). In addition to standards within state licensure laws, several states, including Colorado, Minnesota, and Wisconsin, have enacted laws in which sexual intimacies with clients and, often,
former clients, a felony crime (Herlihy & Corey, 1992; Ethics Committee of the APA, 1988; Chapter 297 Minnesota Laws, 1985; Wisconsin Act 434, 1983). The American Psychological Association professional liability policy followed the same reasoning, setting a limit on the amount of any settlement granted for sexual impropriety with clients, including former clients, with no time limit.

In summary, the courts and state licensing boards seem to be becoming more conservative and more explicit regarding dual relationships, specifically sexual relationships with current and former psychotherapy clients. However, they remain silent on the issue of sexual relationships between supervisors and former supervisees.

Clinical Theory and Research

Therapist-client sexual relationships. The above observations are interesting, especially in light of accumulated theory and research. Akamatsu (1988), who focused exclusively on post-therapy relationships between psychologists and their former clients, randomly surveyed 1,000 members of Division 29 (Psychotherapy) regarding various aspects of sexually intimate relationships with former clients. A number of findings were reported. First, 44.7% of respondents described intimate relationships with former clients as very unethical, 23.9% rated such relationships somewhat unethical, 22.9% rated them neither ethical nor unethical, 22.9% rated them neither ethical nor unethical, 3.7% rated these relationships
somewhat ethical, and the remaining 4.7% rated them very ethical. Second, when asked about factors that should be taken into account in determining the ethics of the situation, the most frequently reported response was time since termination. The second most common response was that these types of relationships are unethical, and no other factors are important. Other factors reported, but less frequently, included transference issues, length of therapy, nature of therapy, nature of termination, freedom of choice, whether exploitation occurred, mental health of the client, whether therapy will be reactivated, and whether there is harm to client welfare. Third, in response to a question concerning an appropriate time interval between termination of therapy and beginning an intimate relationship, the modal response (37.8%) was that no time interval is appropriate, with 32.3% of male respondents and 48.8% of female respondents giving this response. A 1-year interval was considered appropriate by 16.3% of respondents. Other time intervals endorsed by smaller proportions of respondents included: immediately after termination (1%), after 6 months (8.5%), after 2 years (7.5%), and after 3 years (5.7%). An "Other" category was used by 18.7% of the subjects. Generally, subjects felt that time interval should be considered along with other factors. Fourth, respondents believed that intimate relationships with former clients differ moderately from those with current clients. Of the
whole sample, 87.5% believed that some types of relationships, including informal socializing (75.1%), friendship (57.2%), and nonsexual close friendships (36.6%) with former clients were ethical. Significantly smaller percentages of female respondents endorsed nonsexual, close friendships, and friendships as being ethical than did their male counterparts. Approximately 3.5% of male and 2.3% of female respondents admitted having intimate relationships with clients during the course of therapy. When asked whether they had ever been involved in an intimate relationship with a former client, 11% (14.2% of males and 4.7% of females) responded affirmatively. An average of 1.2 of such relationships were reported, and there was an average of 15.6 months between the termination of the therapy and the beginning of the relationship. Finally, ratings of the importance of the APA's developing guidelines regarding this issue averaged 3.87 on a scale of 1 through 5, indicating more than moderate levels of importance. Similarly, subjects believed that it was important (M=3.75) for state boards and ethics committees to develop such guidelines.

Pope (1990) also has provided an extensive review of the research on therapist-client sexual involvement. Pope (1990) reports that the predominant pattern of therapist-client sexual involvement was a male therapist with a female client. For example, a national survey of psychiatrists
(Gartrell, Herman, Olarte, Feldstein, & Localio, 1986) found that 88% of the self-reported instances of therapist-client sexual intimacies involved male therapists with female clients; 7.6% involved male therapists with male clients; 3.5% involved female therapists with male clients; and 1.4% involved female therapists with female clients.

Furthermore, Borys and Pope (1989), in their review of the published literature, noted that all published studies of both sexual and nonsexual dual relationships suggested that male professionals, far more than female professionals, tend to engage in both sexual and nonsexual dual relationships and to endorse such relationships as ethical, beneficial to the client, and/or as not harmful to the client.

The second significant pattern noted in Pope's (1990) review was that therapists who become sexually involved with a client most often do so with a client who is significantly younger. Gartrell et al. (1986, 1989) also reported that the average age of the therapists in such relationships was 43 years, while the average age of the client was 33 years. Bouhoutsos and her colleagues (1983) reported that the average age of sexually involved therapists in their study was 42 years, while the average of the client was 30 years.

Pope's (1990) review also suggested that several factors were not significantly related to therapist-client sexual involvement. One of these factors was professional discipline. Borys and Pope (1989), based on data collected
from an anonymous survey sent to 4800 therapists, reported no significant differences in the rates at which psychiatrists, social workers, and psychologists engaged in sexual intimacies with their clients. No article has reported a significant relationship between theoretical orientation or educational/professional achievements and a therapist's likelihood of becoming sexually involved with a client. In addition, published data failed to support the premise that therapists who undergo personal therapy were less likely to become sexually involved with their clients or the premise that therapists who engaged in nonsexual physical contact with their clients were more likely to become sexually involved with their clients. In contrast, some evidence exists that differential (nonsexual) touching of patients based upon the patients' gender was associated with sexual involvement. Similarly, Pope (1990) found no research published in peer-reviewed journals to support the notion that various clinical (e.g., personality disorder) and historical (e.g., history of sexual abuse) factors place a client at greater risk for sexual involvement with a therapist. Indeed, Bates and Brodsky (1989), after a review of the accumulated data, concluded, "The best single predictor of exploitation in therapy is a therapist who has exploited another patient in the past" (p. 141).

Expanding on the issue of therapist-client sexual relationships, Lamb et al. (under review) explored the
effects of three variables on judgements of professional appropriateness of engaging in post-therapy relationships with former clients. Subjects were randomly selected clinical and counseling psychologist practitioners who were members of the American Psychological Association. The variables explored included type of relationship (sexual versus business), time since termination (0-5 months, 6-11 months, 12-17 months 18-24 months, after 2 years, and after 3 years), and initiator (therapist, client, or mutual) of the post-therapy relationship. A number of important findings were reported. First, 29% (n=94) of the respondents had been involved in a business relationship with a former client, and 6.5% (n=21) of respondents reported sexual relationships with former clients. Males reported involvement in both types of relationships at much higher rates than female respondents. Second, across both time and initiator, sexual relationships generally were viewed as either "somewhat inappropriate" or "definitely inappropriate," while business relationships were rated "somewhat inappropriate" or "undecided." Furthermore, sexual relationships were always rated as significantly more inappropriate than business relationships when these two types of relationships were compared at any of the same time periods. Ratings of appropriateness varied significantly as a function of time. Respondents rated sexual relationships with former clients as highly inappropriate within the first
year since termination, and these ratings of appropriateness decreased linearly with the passage of time since termination, though they remained at approximately "somewhat inappropriate" level even after several years. Similarly, ratings of appropriateness of business relationships decreased with the passage of time. However, the ratings of appropriateness for business relationship were much lower than those for sexual relationships; while ratings of sexual relationships remained at about the "somewhat inappropriate" level after both two and three years post-termination, respondents remained undecided regarding the appropriateness of business relationships after two and three years. Overall, 59% of all respondents indicated that sexual relationships with former clients would never be appropriate; only 10% of all respondents indicated that a business relationship would never be appropriate. The highest ratings of inappropriateness are under the condition of therapist initiated, followed by client initiated, and then mutually initiated; the therapist initiated condition was significantly higher than the other two initiator conditions, and no difference between the client and mutually initiated conditions was found. The ratings of inappropriateness as a function of initiator did not change differentially with the passage of time for sexual and business relationships. However, the ratings of
inappropriateness as a function of who initiates did change differentially with the passage of time.

In summary, respondents viewed sexual relationships as inappropriate, particularly within the first year after termination. While the ratings of inappropriateness decreased over time, respondents indicated that engaging in sexual relationships with former clients even after three years was somewhat inappropriate. The finding that a significant number of therapists believed that sexual relationships with former clients are always inappropriate indicates a strong prohibition against this behavior.

Effects of Therapist-client Sexual Relationships

Another important issue that affects the "professional appropriateness" of dual relationships with clients focuses on the psychological impact of such relationships on clients. Numerous approaches have been utilized to learn about the effects of intimacies with a therapist on a client (Bouhoutsos et al., 1983; Brown, 1988; Butler & Zelen, 1977; Feldman-Summers & Jones, 1984; Gartrell, Herman, Olarte, Feldstein, & Localio, 1987; Sonne, Meyer, Borys, & Marshall, 1985; Vinson, 1987). These studies have evaluated clients who have sought help from a subsequent therapist, as well as those who have not. They have evaluated groups of clients who have engaged in sexual intimacies with a psychotherapist in contrast to matched groups of clients who have not engaged in sexual intimacies and of patients who have
engaged in intimacies with physicians who were not psychotherapists. In addition, they have explored the possible effects of such intimacies as assessed by the patients themselves, by subsequent therapists treating the individual, and by independent clinicians utilizing such methods as clinical interviews, observation, and standard psychological test instruments. Overwhelmingly, the research speaks to the negative effects of dual relationships, particularly sexual relationships. Pope (1986) asserted that the negative effects identified by such studies tend to cluster into a distinct clinical syndrome for the client. Therapist-Patient Sex Syndrome includes 10 general categories: (a) ambivalence, (b) feelings of guilt, (c) feelings of emptiness and isolation, (d) sexual confusion, (e) impaired ability to trust often focused on conflicts about dependence, control, and power), (f) identity, boundary, and role confusion, (g) emotional lability (frequently involving severe depression), (h) suppressed rage, (i) increased suicidal risk, and (j) cognitive dysfunction (particularly in the areas of attention and concentration, frequently involving intrusive thoughts, unbidden images, flashbacks, and nightmares). The Therapist-Patient Sex Syndrome contains obvious similarities to various aspects of borderline personality disorder, post-traumatic stress disorder, rape response syndrome, reaction
to incest, and reaction to child or spouse battering (Pope, 1986).

**Similarities Between Therapist-client Relationships and Supervisor-supervisee Relationships**

Further exploration of dual relationships has resulted in a shift away from a focus solely on therapist-client dual relationships. The result has been that additional attention has been given to other types of dual relationships, particularly those involving educators, trainers, and supervisors. A number of theorists have pointed to the similarities between the supervisor-supervisee relationship and the counselor-client relationships. Fleming & Benedek (1966) have likened the supervisory relationship to a "learning alliance" in which interactions between the supervisor and supervisee tend to parallel those between supervisee and client (Doehrman, 1976; Ekstein & Wallerstein, 1958). In addition, several theorists have suggested that supervision requires a multiplicity of roles, one of which is the counselor-therapeutic role (Bartlett, 1983; Bernard, 1979; Hart, 1982; Hess, 1980; Littrell, Lee-Borden, & Lorenz, 1979). Just as a client's vulnerability in relation to the power, status, and expertise of the therapist is a special concern, the vulnerability of the supervisee in relation to the power, status, and expertise of the supervisor is a special concern (Barnat, 1980; Doehrman, 1976; Newman, 1981; Rioch, 1980;
Robiner, 1982). Supervisees, like individuals seeking therapy, frequently are in a poor position to negotiate or safeguard their rights due to their vulnerability and lack of knowledge (Hare-Mustin, Maracek, Kaplan, & Liss-Levinson, 1979). For example, supervisees may not be in a position of free choice if they must fulfill certain practica and internship requirements to complete a degree and at the same time compete for a limited number of positions (Jacobs, 1991; Minnes, 1987).

According to Stenack & Dye (1983), when the supervisor is in the therapist role, he or she focuses on the trainee as a person. The goal of supervision is the trainee’s self-growth, and techniques and interventions are used to accomplish this purpose. Cormier and Bernard (1982) seemed to concur, stating that the dual relationship, in which a supervisor provides personal counseling to trainees, probably does exist to some degree because of the perceived importance of focusing on trainees’ interpersonal and intrapersonal dynamics. Whiston and Emerson (1989) argued that, while the counselor-therapeutic role in supervision and counseling of trainees are not synonymous, the distinction between the two is not well-defined, and it is sometimes difficult to determine when a supervisory relationship has developed into a counseling relationship. Additionally, Doehrman (1976) documented the process whereby supervisees develop highly emotional and unusually intense
reactions to their supervisors, in much the same way that a client experiences a strong transference reaction to a therapist. Similarly, supervisors are not necessarily immune to the intense effects of the supervisory relationship, and strong countertransference reactions to a trainee may be experienced. In such a situation, the supervisor may be ethically compromised if his or her relationship with, or evaluation of, a supervisee is affected (Minnes, 1987). Furthermore, in some instances, supervisors may have secondary motives, whether conscious or unconscious, for supervising trainees, and gains related to the gratification of a supervisor’s needs can present particular ethical problems (Brooker, 1979; Chessick, 1971).

Dual Relationships Between Trainers and Trainees

Research on dual relationships involving supervisors, educators, or trainers and their trainees is relatively limited when compared to the amount of research on therapist-client dual relationships. Pope, Levenson, & Schover (1979), in a survey of 481 members of Division 29 (Psychotherapy) of the American Psychological Association, found that, as graduate students, 9.4% of the respondents reported sexual contact with their educators (i.e., psychology teachers, clinical supervisors, and administrators). Five percent of the respondents (8% of the women and 2% of the men) reported sexual contact with their supervisors. In addition, 13% of the 291 educators reported
sexual contact with their students. Four percent of the 263 supervisors in this sample (2% of the women and 6% of the men) reported having engaged in sexual relations with their supervisees. There were significant gender differences in both instances. Sexual contact when they were students was reported by 16.5% of the women and 3% of the men; conversely, 19% of the men reported such contact when they became educators, compared to 8% of the women. Despite these findings, only 2% of the respondents believed that sexual relationships between educators and students could be beneficial.

Pope et al. (1979) also reported a "recency effect" for women who had reported sexual contact with a psychology educator. The percentage of sexual contact with an educator among recent female graduates (1972-1978) was 25%, compared with only 5% for women who had earned their degrees before the mid-1950's. Sexual contact with a clinical supervisor was reported by over 12% of the more recent female graduates. Whether this apparent increase in sexual contact reflects an increased tendency to report sexual intimacies or an actual increase in the incidence of sexual contact is unclear.

Results also suggested a "modeling effect" in which women who, as students, had engaged in sexual contact with their educators were at greater risk of repeating the pattern as educators; that is, they were more likely to
later become sexually involved with their students or supervisees. Of the women who, as students, had entered into sexual relationships with their educators, 23% reported making subsequent sexual advances while serving in a professional capacity. In contrast, 6% of the women who had not engaged in sexual activity with their educators reported unethical sexual relations as professionals. Thus, these data seem to indicate that modeling may have a strong impact on the perpetuation of unethical behaviors in supervision.

Robinson and Reid (1985) used questions similar to those of Pope et al. (1979) in their survey of a random sample of 287 female psychologists. Results indicated that 13.6% of the respondents reported having had sexual contact with psychology educators during their tenure as graduate students. Sexual contact with training supervisors was reported by 5% of the women. Approximately 1.4% of these female psychologists admitted to having had sexual contact with their supervisees. In addition, almost one half (48.1%) of the respondents reported having experienced some kind of attempted seduction by at least one educator during their graduate training. Most (49.2%) of the women who experienced sexual harassment were trained in clinical psychology. Supervisors were implicated in 49.6% of these cases.

Although Robinson and Reid (1985) did not find a recency effect for sexual contact during graduate training,
they did report an interesting time-related finding for sexual contact among professionals. Sexual intimacy with supervisees, supervisors, and senior-level faculty was reported by 7% of their sample of employed professionals. All of these women had graduated between 1968 and 1976. No sexual contacts were reported by either the more recent graduates (1977-1980) or by the women who had received their degrees prior to 1968.

Among the women who had experienced sexual contact or sexual harassment, 95.7% (n=184) reported that they believed these relationships were detrimental to one or both parties. Over 90% favored special grievance procedures and policies for this problem.

Glaser and Thorpe (1986) surveyed 464 female members of APA Division 12 (Clinical Psychology). Overall, 17% of the respondents reported that they had been sexually involved with their psychology educators while they were students. Slightly less than 5% of the respondents reported sexual contact with their clinical supervisors. Over one third (n=144) of the women reported sexual advances by psychology educators that did not lead to actual sexual contact. Over 25% (n=54) of these sexual advances were made by clinical supervisors. Incidences of sexual contact were more common among women who were divorced or separated during their graduate training.
Of those individuals who reported sexual contact, the majority felt that their actions were not coerced. Only 28% perceived some degree of coercion at the time of the contact. However, 51% see some degree of coercion in retrospect. Similarly, 36% saw an ethical problem at the time of sexual contact, while 55% saw an ethical problem in retrospect. These results suggest that the perception of the sexual experience with an educator became more negative with the passage of time; that is, when they were surveyed, respondents described their sexual involvement as substantially more exploitative and unethical than they had felt it to be during the experience. These changes in judgements may reflect an increased sensitivity to the problems of such relationships, a sensitivity that was absent at the time of the contact.

Glaser and Thorpe’s (1986) results are consistent with those of Pope et al. (1979), with the higher rates of sexual contact having occurred with the more recent graduates. Among women who had received their degrees prior to 1963, 9% reported sexual contact with a psychology educator, while the incidence rate rose to 23% among female graduates of the early 1970’s (1972-1976). Over 21% of the most recent group of graduates (1977-1982) reported having experienced sexual intimacies with psychology educators, thus indicating that the occurrence of sexual misconduct had not declined. However, this pattern is in contrast to the pattern found by
Robinson & Reid (1985), who surveyed female doctorates in psychology randomly selected from the 1978 APA Membership Directory regarding sexual harassment experiences during their training years. Of the 287 women who responded to Robinson and Reid's (1985) survey, almost half (48.1%) reported having experienced some form of sexual seduction, such as "flirting," "joking," and "excessive attention," during their years as students. The most recent graduates (from 1 to 3 years) reported the lowest rate of sexual seduction experienced as trainees (4.3%), while women whose training had been completed for 4 or more years were more likely to report sexual seduction experiences. Most of the women who reported having experienced sexual seduction had completed their training 4 to 8 years (32.4%) or 9 to 12 years (33.8%) prior to completing the survey.

When asked about their current opinions concerning sexual contact between educators and students, 95% of Glaser and Thorpe's (1986) respondents judged the contact to be coercive, unethical, and harmful to working relationships. Apparently, unethical sexual contact in this field is judged more harshly in the abstract than it is when the situation actually arises. In addition, it is important to note that only 12% of this sample received graduate training on the issue of sexual contact between educators and students, while 67% reported having received training about sexual intimacies with clients.
Pope, Tabachnick, & Keith-Spiegel (1987, 1988) surveyed APA Division 29 members regarding the degree to which they engaged in each of 83 behaviors and the degree to which they considered each behavior to be ethical. In the 1987 study, only 3.4% of the respondents reported engaging in sex with a clinical supervisee; this figure corresponds very closely to the 4.0% in a prior survey of APA Division 29 members who reported engaging in sexual intimacies with their clinical supervisees (Pope, Levenson, & Schover, 1979). A large majority (85.1%) of the respondents in the 1987 study believed that sexual intimacies with clinical supervisees are unethical, while 89.5% of the respondents in the 1988 companion study believed that engaging in sex with a clinical supervisee represented poor practice. Furthermore, a comparison of the results of the 1987 and 1988 companion studies suggest that the respondents’ behaviors were generally in accordance with their beliefs about good and poor practices.

Tabachnick, Keith-Spiegel, and Pope (1991) focused their research efforts on the beliefs and practices of psychologists with a study that focused on the beliefs and behaviors of psychologists functioning as educators. Survey data were collected from 482 APA members whose primary work setting was in an institution of higher education. They were asked the degree to which they engaged in each of 63 behaviors and the degree to which they considered each of
these behaviors to be ethical. Results indicated that 89% of respondents never became sexually involved with a student, while 9.5% did so only rarely, 1.0% did so sometimes, 0.4% did so fairly often, and 0.0% did so very often. In contrast, when asked about becoming involved with a student only after the student had completed the educator's course and the grade had been filed, 80.7% responded that this never happens, 14.7% reported that it rarely happens, 2.7% were unsure or did not know, 0.4% reported that it happens fairly often, and 0.4% reported that it happens very often. Interestingly, becoming sexually involved with a student after the course was completed was more likely among men (26%) than among women (12%), although mostly on a rare basis. With regard to how ethical becoming sexually involved with a student was, 71.0% of respondents reported that it is unquestionably not ethical; 19.7% responded that it is ethical under rare circumstances; 2.3% were not sure or did not know; 3.7% reported that it is ethical under many circumstances; and 2.3% reported that becoming sexually involved with a student was unquestionably ethical. When asked about the ethics of becoming sexually involved with a former student, 20.7% of respondents reported that this was unquestionably not ethical; 26.3% reported that it is ethical under rare circumstances; 17.0% did not know or were not sure; 24.5% responded that it was ethical under many circumstances; and
1.2% reported that it was unquestionably ethical. Respondents also reported that they never (99.0%) or rarely (1.0%) make deliberate or repeated sexual comments, gestures, or physical contact that is unwanted by the student. The majority believed that such behavior was unquestionably not ethical (94.6%), while 0.6% believed it was ethical under rare circumstances; 0.4% reported being unsure or not knowing; 0.2% believed it was ethical under many circumstances; and 3.5% believed that it was unquestionably ethical.

Summarizing the research on supervisor-supervisee sexual contacts, approximately 5% of respondents indicated that they had experienced sexual contact with their supervisors (Glaser & Thorpe, 1986; Pope et al., 1979; Robinson & Reid, 1985). Between 1% and 4% of the supervisors reported sexual contact with their supervisees (Pope et al., 1979, 1987; Robinson & Reid, 1985). The reported incidence of sexual contact between supervisors and supervisees increased since the 1950's and stabilized during the past decade (Glaser & Thorpe, 1986; Pope et al., 1979; Robinson & Reid, 1985). A sizable proportion of the sample surveyed reported minimal training in the area of sexual ethics: between 55% (Pope et al., 1986) and 88% (Glaser & Thorpe, 1986) reported receiving no education; between 9% (Glaser & Thorpe, 1986) and 24% (Pope et al., 1986) reported receiving very little training; and only 3% reported
"thorough" coverage of this issue (Glaser & Thorpe, 1986). Training may be related paradoxically to the incidence rates of supervisor-supervisee sexual contact reported by several researchers (i.e., Glaser & Thorpe, 1986; Pope et al., 1979). That is, recent graduates are more likely to have received information regarding ethical behavior during their training and may be more sensitive to and aware of the unethical nature of sexual contact with their supervisors. Education may serve to increase the tendency to report sexual misconduct and simultaneously serve to decrease the likelihood of its occurrence. Thus, it appears that education may be the strongest weapon against unethical sexual contact (Bartell & Rubin, 1990).

Effects of Supervisor-supervisee Sexual Relationships

Just as sexual contact between therapist and client may have any number of negative sequelae, which Pope (1986) has termed the Therapist-Patient Sex Syndrome, so might sexual harassment or sexual involvement between supervisor and supervisee threaten the benefits to be gained from the supervisory experience (Bartell & Rubin, 1990). This damage can result when (a) the supervisor becomes a model for the abuse of power, thereby increasing the likelihood that the supervisee will initiate sexual contact in future therapy or supervisory relationships; (b) the supervisee fails to communicate with the supervisor about matters related to sex, such as aspects of client sexuality or sexual
attraction between client and therapist, for fear of "initiating a parallel discussion" with the supervisor; and (c) the supervisor loses the ability to evaluate fairly and objectively, and (d) the supervisee feels that his or her career hinges on acquiescing to the supervisor (Conroe et al., 1989).

Rationale and Purpose of this Study

The professional literature on dual relationships outlines some of the ethical and legal considerations, the clinical theory and research regarding dual relationships, and the parallels between the therapist-client relationship and the supervisor-supervisee relationship. Thus, there is reason to believe that there may be a need for greater similarity between the ethical guidelines regarding sexual relationships between therapist-client and the ethical guidelines regarding sexual relationships between supervisor-supervisee.

As noted previously, the attention to the ethical appropriateness of sexual relationships between therapist and former client has been relatively recent, perhaps stimulated by the numerous pieces of clinical theory and research which explored the issue. The Ethics Code (APA, 1992) is more specific in the proscription of sexual relationships with former clients. In addition, many states have enacted legislation against sexual relationships with former clients for anywhere from a minimum of one year post-
termination to complete prohibition, asserting that once an
individual has been a client, he or she is always a client (Herlihy & Corey, 1992). However, no parallel explicit
prohibition of sexual contact between supervisors and former
supervisees has been adopted.

Apparently, much of the increased attention to the
ethical appropriateness of sexual relationships between
therapist and former client has been stimulated by the
numerous pieces of clinical theory and research addressing
this issue. Perhaps, with some exploration of the issue of
sexual relationships between supervisors and former
supervisees, psychologists will be provided with more
explicit guidelines addressing the issue of dual
relationships involving supervisors and supervisees. Thus,
the purpose of this study was to provide some initial
exploration of sexual relationships between supervisors and
former supervisees, including supervisors' judgements of the
professional appropriateness of such relationships, the
relationship between supervisors' own sexual relationships
and their judgements of the professional appropriateness of
sexual relationships between supervisors and former
supervisees, and the factors which influence judgements of
professional appropriateness of sexual relationships between
supervisors and former supervisees.
Research Questions

The main question in this study focused on the relationships, if any, between two independent variables, time since termination of the supervisory relationship and initiator of the sexual relationship, and one dependent variable, judgements of professional appropriateness of engaging in a sexual relationship with a former supervisee. Additional questions added a third independent variable, the respondents' own history of a sexual relationship with a former supervisor, a current supervisor, a former supervisee, or a current supervisee, to the analysis. Thus, the effects of time since termination, initiator of the sexual relationship, and the respondents' own sexual history on judgements of professional appropriateness of PTSR's with a former supervisee were analyzed. Due to the exploratory nature of this study, no specific hypotheses were predicted.

Another question in this study focused on determining what variables might influence respondents' ratings of the professional appropriateness of engaging in PTSRs. The relevance of five variables (the stage of training of the supervisee; the emphasis of supervision, such as therapy vs. collegial vs. expert; the length of the supervisory relationship; the former supervisee's status as student vs. graduate at the time the relationship is initiated; and the potential to have the former supervisee in another role,
such as student or research assistant, in the future), were explored utilizing descriptive statistics.

Finally, other variables, as reported by respondents, which might be important to determinations of the professional appropriateness of PTSRs, were explored utilizing descriptive statistics.
CHAPTER III

METHOD

Participants

The participant population identified for this study consisted of 964 psychologists involved in the ongoing supervision of graduate level psychologists-in-training at Association of Post-doctoral and Psychology Internship Center (APPIC) sites in the United States during the 1991-1992 academic year. Completed surveys were returned by 358 psychologists. Thus, the response rate was 37% of the 964 questionnaires initially distributed. This response rate was better than the 34.8% response rate for the parallel study by Lamb, et al. (under review). Furthermore, given the fact that no survey follow-up was possible due to assurances of anonymity of respondents, the 37% response rate was very good.

Responses came from 43 different states. Overall, 50.6% (n = 181) of the respondents were male and 49.4% (n = 177) of the respondents were female. Respondents ranged in age from 29 to 72 years, with an average age of 42.53 years (SD = 7.9 years). Racially/ethnically, 91.9% (n = 329) of the respondents were Caucasian, 3.6% (n = 13) were Asian, 2.5% (n = 9) were Hispanic, 1.1% (n = 4) were biracial, and
0.8% (n = 3) were African-American. The majority of respondents also reported being in a relationship, with 71.2% (n = 255) married and 7.5% (n = 27) partnered, while 12.6% (n = 45) were single, 7.0% (n = 25) were divorced, 1.1% (n = 4) were separated, and 0.3% (n = 1) was widowed. One respondent (0.3%) reported being in a relationship that did not fit into any of the above categories. With regard to professional identification, 74.0% (n = 265) were clinical psychologists; 22.9% (n = 82) were counseling psychologists; and 3.1% (n = 11) reported another, unspecified professional identification. The majority (87.7%; n = 314) of respondents reported that the highest educational degree they had earned was a Doctor of Philosophy degree, while 8.7% (n = 31) had earned a Doctor of Psychology degree, 2.5% (n = 9) had earned a Doctor of Education degree, 0.6% (n = 2) had earned a Master of Science or Master of Arts degree, and 0.6% (n = 2) had earned another degree not specified. The large majority (98.3%; n = 352) of the respondents reported being licensed as a psychologist in at least one state. The number of years of experience delivering psychotherapeutic services as a psychologist ranged from one year to 38 years, with an overall average of 11.68 years (SD = 8.07). The average number of years of involvement in the supervision of psychology graduate trainees was 6.70 years (SD = 7.18) at the practicum level, 8.20 years (SD = 9.09) at the
internship level, and 3.29 years ($SD = 8.35$) at the post-doctoral level. Respondents represented a variety of work settings, with each respondent identifying a primary work setting, and, if applicable, a secondary work setting. The most common primary work setting was university counseling centers (19.3%; $n = 69$), medical centers (17.9%; $n = 64$), Veterans Administration hospitals (17.0%; $n = 61$), community mental health centers (14.8%; $n = 53$), state hospitals (11.5%; $N = 41$), and private practice (5.6%; $n = 20$). Almost half (46.4%, $n = 166$) of the respondents reported their secondary work setting as being private practice, while 38.8% ($n = 139$) of the respondents reported no secondary work setting. Secondary work setting percentages for other sites ranged from 0.6% to 4.7%. Due to the lack of demographic data about the clinical supervisors participating in APPIC programs, no comparisons can be made between the sample for this research and the parent population.

**Questionnaire**

A questionnaire was developed to examine the degree that psychologists involved in the ongoing supervision of psychology graduate trainees view sexual relationships with former supervisees as professionally appropriate or inappropriate. The questionnaire followed the same format as that used by Lamb, et al. (under review) in their study of professional judgements of sexual relationships with
former clients. Participants in this study were informed that, though the questionnaire was five pages long, participants in a pilot run of the survey only required approximately 15 minutes to complete it.

The first section of the questionnaire consisted of demographic information, including gender, age, race/ethnicity, relationship status, years delivering psychotherapy services, licensure status, years involved in the supervision of psychology graduate trainees, work setting, and highest degree earned.

The second section focused on two factors, time since termination and who initiated the relationship (former supervisor or former supervisee), which may influence professional judgements of the appropriateness of engaging in a sexual relationship with a former supervisee. To increase the standard frame of reference for responding to these questions, respondents were asked to make the following assumptions: (a) a sexual relationship is characterized by physical and/or non-physical expressions of sexuality (e.g., any form of intimate sexual contact, such as kissing, fondling, or intercourse, or non-physical communications of sexual intent and/or desire); (b) "supervisee" refers to a psychology graduate trainee at the practicum, internship, and/or post-doctorate (first year after graduation with the doctorate) level; (c) "supervisor" refers to a psychologist who, in his/her professional role,
evaluates the psychotherapeutic work of a graduate level psychologist-in-training, or "supervisee"; (d) the supervisee is the gender to whom the supervisor is most physically attracted; and (e) termination of the supervisory relationship was "appropriate and uncomplicated." The condition of initiator (former supervisor as initiator and former supervisee as initiator), was counterbalanced, and respondents were asked to indicate on each of six time frames (0-5 months, 6-11 months, 12-17 months, 18-24 months, after 2 years, and after 3 years) the degree to which a sexual relationship between a former supervisor and former supervisee would be considered "professionally appropriate." The term "professionally appropriate" was utilized rather than "unethical" because the term "unethical" may have been confusing in that it could have referred to an attitude and/or practices already articulated within the Ethical Principles of Psychologists and Code of Conduct. Since, as of this writing, sexual relationships with former supervisees were not explicitly considered unethical by the Ethics Code, using "professionally appropriate" rather than "unethical" served to reduce possible confusion.

Under each initiator condition, respondents were asked to utilize a Likert scale (1 = definitely appropriate, 2 = somewhat appropriate, 3 = undecided, 4 = somewhat inappropriate, 5 = definitely inappropriate) to indicate the degree of professional appropriateness of engaging in a
sexual relationship. Then, if respondents answered either "4" or "5" to the "after 3 years" time frame, they were asked to identify the time frame, if any, when developing a sexual relationship would be professionally appropriate. Thus, ratings of professional appropriateness of engaging in a sexual relationship under two conditions of initiation and 6 post-termination time frames were requested.

The third section listed five variables which might influence the respondents' ratings of the professional appropriateness of engaging in a PTSR with a former supervisee. These variables included the stage of training of the supervisee (such as beginning practicum, advanced practicum, intern); the emphasis of supervision (such as a focus on therapy vs. a collegial approach vs. an expert approach); the length of the supervisory relationship; the former supervisee's status as a student vs. a graduate at the time the PTSR is initiated; and the potential to have the former supervisee in another role (such as student or research assistant) in the future. Respondents were asked to rate the relevance of each of these variables in determining the appropriateness of a PTSR with a former supervisee by using a 5-point Likert scale (1 = irrelevant; 2 = somewhat irrelevant; 3 = undecided; 4 = somewhat relevant; and 5 = very relevant).

The fourth section of the survey provided the respondents with the opportunity to identify any other
factors which might influence their judgements of professional appropriateness.

The last section asked respondents if they had ever had a sexual relationship with a current supervisor, a former supervisor, a current supervisee, and/or a former supervisee, and, if so, how many times and the length of time between termination of the supervisory relationship and the initiation of a sexual relationship. These questions were counterbalanced, and the information provided was used to facilitate exploration of the relationship, if any, between personal experiences with sexual relationships and judgements of professional appropriateness of sexual relationships with former supervisees.

Procedure

Training directors at each of the 482 pre-doctoral internship sites in the United States listed in the 1991-1992 edition of the APPIC Directory (Association of Psychology Postdoctoral and Internship Programs, 1991-1992) received a letter (see Appendix A) requesting the center's participation in this study. All sites received two complete survey packets, one for a female and one for a male respondent. Each survey packet included a cover letter describing the nature of the study and requesting participation, as well as inviting respondents to request a copy of the results (see Appendix B); a copy of the questionnaire (see Appendix C); and a business reply
envelope. Training directors were asked to invite staff psychologists involved in the ongoing supervision of psychology graduate trainees at the practicum, internship, or post-doctoral (first year after graduation with doctorate) level to complete the survey, and a central location where potential respondents were able to pick up a survey packet anonymously was identified within each agency. Participants were instructed to return the completed survey within two weeks. Due to the professionally sensitive nature of the survey content, surveys were not coded, insuring that responses were anonymous, and participation was completely voluntary.

Data Analysis

As completed surveys were returned, they were coded for statistical analysis, which began with an analysis of demographic data utilizing descriptive statistics. A 2 x 6 multivariate analysis of variance (MANOVA) (P. Klass, personal communication, March, 1992; K. Strand, personal communication, December 22, 1992; Tabachnick & Fidell, 1983) was conducted to determine the relationships between the two independent variables, initiator (supervisor or supervisee) and time since termination of the supervisory relationship (six time periods), and the dependent variable, ratings of the professional appropriateness of engaging in a PTSR with a former supervisee. Post-hoc Scheffé analyses were
conducted on the significant main effects for time resulting from the MANOVA.

A 2 x 6 x 2 MANOVA (N. Jones, personal communication, July 22, 1993; P. Klass, personal communication, March, 1992; K. Strand, personal communication, July 22, 1993; Tabachnick & Fidell, 1983) also was conducted to determine the effects of three independent variables, initiator (supervisor or supervisee), time since termination of the supervisory relationship (six time periods), and history of a sexual relationship with a member of the supervisory dyad (history of a sexual relationship or no history of a sexual relationship) on judgements of the professional appropriateness of engaging in a PTSR with a former supervisee. For this 2 x 6 x 2 MANOVA, the ratings of the professional appropriateness of PTSRs of the 33 respondents who did report a history of a sexual relationship with either a former or current supervisor or a former or current supervisee were compared with the ratings of 33 randomly selected respondents with no such sexual history (N. Jones, personal communication, July 22, 1993; K. Strand, personal communication, July 22, 1993; Tabachnick & Fidell, 1983). Post-hoc Scheffé analyses were conducted on the significant main effects for time resulting from the MANOVA.

Finally, descriptive statistics were utilized to determine the relevance of variables that might influence professionals' decision-making process regarding
professional appropriateness of sexual relationships with former supervisees. Descriptive statistics also were utilized to determine the frequencies of variables reported by respondents to be influential in their ratings of professional appropriateness of PTSRs. Due to the exploratory nature of this study, the relationship between these variables and the ratings of professional appropriateness of post-termination sexual relationships was not analyzed.
CHAPTER IV
RESULTS
Ratings of Professional Appropriateness as a Function of Time and Initiator

Respondents were asked to rate the professional appropriateness of engaging in a sexual relationship with a former supervisee at six time frames after termination of the supervisory relationship and under two initiator conditions (supervisor-initiated and supervisee-initiated). Ratings were made on a Likert scale, with 1 being "definitely appropriate," 2 being "somewhat appropriate," 3 being "undecided," 4 being "somewhat inappropriate," and 5 being "definitely inappropriate." In order to analyze the effects of initiator and time on ratings of the professional appropriateness of engaging in a PTSR with a former supervisee, a 2 x 6 MANOVA was conducted (K. Strand, personal communication, December 22, 1992; Tabachnick & Fidell, 1983). Table 1 presents means and standard

Insert Table 1 about here

deviations for ratings of the professional appropriateness of engaging in post-termination sexual relationships (PTSRs)
Table 1
Means and Standard Deviations of Ratings of Professional Appropriateness as a Function of Time and Initiator

<table>
<thead>
<tr>
<th>Init.</th>
<th>0-5 mos.</th>
<th>6-11 mos.</th>
<th>12-17 mos.</th>
<th>18-24 mos.</th>
<th>After 2 yrs.</th>
<th>After 3 yrs</th>
<th>Overall</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>M</td>
<td>SD</td>
<td>M</td>
<td>SD</td>
<td>M</td>
<td>SD</td>
<td>M</td>
</tr>
<tr>
<td>S'or</td>
<td>4.63</td>
<td>0.85</td>
<td>4.42</td>
<td>1.06</td>
<td>3.92</td>
<td>1.33</td>
<td>3.68</td>
</tr>
<tr>
<td>S'ee</td>
<td>4.56</td>
<td>0.88</td>
<td>4.24</td>
<td>1.16</td>
<td>3.66</td>
<td>1.41</td>
<td>3.42</td>
</tr>
<tr>
<td>Mean</td>
<td>4.59</td>
<td>0.87</td>
<td>4.33</td>
<td>1.11</td>
<td>3.79</td>
<td>1.37</td>
<td>3.55</td>
</tr>
</tbody>
</table>

Note: Init. = initiator; S'or = supervisor; S'ee = supervisee. 1 = definitely appropriate, 2 = somewhat appropriate, 3 = undecided, 4 = somewhat inappropriate, 5 = definitely inappropriate.
with a former supervisee under two conditions of initiation (supervisor and supervisee) and across six periods of time since termination of the supervisory relationship. Results indicated that, overall, across both time and initiator conditions, PTSRs were rated between "undecided" and "somewhat inappropriate" ($M = 3.66$). Furthermore, both main and interaction effects were significant, indicating that ratings of the professional appropriateness of engaging in a PTSR with a former supervisee did vary significantly as a function of initiator, $F(1, 351) = 87.39$, $p < .0001$; time $F(5, 1755) = 526.76$, $p < .0001$; and the interaction of initiator and time, $F(5, 1755) = 100.91$, $p < .0001$. More specifically, as time since termination increased, PTSRs were rated as increasingly appropriate. During the first 5 months after termination, PTSRs were rated, on average ($M = 4.59$), as midway between "somewhat inappropriate" and "definitely inappropriate." PTSRs continued to be rated as inappropriate for up to 24 months post-termination ($M = 4.33$ for 6-11 months post-termination; $M = 3.79$ for 12-17 months post-termination; $M = 3.55$ for 18-24 months post-termination). After 2 years post-termination, PTSRs were rated as "undecided" ($M = 2.96$); after 3 years post-termination, PTSRs were rated between "undecided" and "somewhat appropriate" ($M = 2.77$). Thus, even after three years post-termination, PTSRs just began to approach being rated as "somewhat appropriate."
Post-hoc Scheffé analyses indicated that almost all of the differences in ratings between any one time period and each of the subsequent time periods were significant. Respondents rated PTSRs as significantly less appropriate 0-5 months post-termination (M = 4.59) than 6-11 months post-termination (M = 4.33), F(5, 1755) = 426.76, p<.03, and each of the remaining time periods (12-17 months post-termination, M = 3.79; 18-24 months, M = 3.55; after 2 years, M = 2.96; and after 3 years, M = 2.77), F(5, 1755) = 426.76, p<.01. Similarly, with a few exceptions, at each time period, PTSRs were rated as significantly less appropriate than PTSRs at any of the subsequent time periods, F(5, 1755) = 426.76, p<.01. One exception was the difference in ratings of professional appropriateness of PTSRs between the 12-17 and 18-24 months post-termination time periods, which were significant at the .05 level. The only other exception was that the difference in ratings between the "after 2 years" and "after 3 years" time periods was not significant.

The main effect for initiator was significant, F(1, 35) = 87.39, p<.0001. The overall ratings of appropriateness for PTSRs for both supervisor-initiated (M = 3.77) and supervisee-initiated (M = 3.56) were somewhere between "undecided" and "somewhat inappropriate." However, at each time period, the supervisor-initiated TSR was rated as significantly more inappropriate (0-5 months, M = 4.63; 6-11
months, $M = 4.42$; 12-17 months, $M = 3.92$; 18-24 months, $M = 3.68$; after 2 years, $M = 3.08$; after 3 years, $M = 2.89$) than supervisee-initiated PTSRs (0-5 months, $M = 4.56$; 6-11 months, $M = 4.24$; 12-17 months, $M = 3.66$; 18-24 months, $M = 3.42$; after 2 years, $M = 2.83$; after 3 years, $M = 2.65$).

In addition, under the supervisor-initiated condition, 22.9% ($n = 82$) of the respondents reported that a PTSR with a former supervisee would never be appropriate, regardless of the time since termination. The majority of respondents (66.2%, $n = 237$) did not respond to this question because they had already indicated that they were "undecided" about the professional appropriateness of PTSRs "after 3 years" post-termination, or they had reported that PTSRs with a former supervisee were either "definitely appropriate" or "somewhat appropriate" "after 3 years" after termination of the supervisory relationship. Approximately one-tenth (10.9%, $n = 39$) reported that PTSRs with former supervisees would be appropriate sometime after three years after termination of the supervisory relationship. Of the 39 respondents who indicated that there would be a time after three years post-termination when a PTSR with a former supervisee would be appropriate, 22 (56% of the 39 participants who responded to this question; 6% of the total number of survey respondents) responded to a question about what that time frame might be and reported an average time
frame of 82.27 months, or approximately 6 years and 10 months post-termination (SD = 68.57 months).

Under the supervisee-initiated condition, 17.0% (n = 61) of the respondents reported that a PTSR with a former supervisor would never be appropriate, regardless of the time since termination. Almost three-quarters (72.1%, n = 258) did not respond to this question because they had already indicated that they were "undecided" about the professional appropriateness of PTSRs "after 3 years" post-termination, or they had reported that PTSRs with a former supervisee were either "definitely appropriate" or "somewhat appropriate" "after 3 years" after termination of the supervisory relationship. Similar to the supervisor-initiated condition, almost one-tenth (10.9%, n = 39) reported that PTSRs with former supervisees would be appropriate sometime after three years after termination of the supervisory relationship. Of the 39 respondents who indicated that there would be a time after three years post-termination when a PTSR with a former supervisor would be appropriate, 21 (34% of the 39 participants responding to this question; 6% of the total number of survey respondents) responded to a question about what that time frame might be and reported an average of 83.67 months, or slightly less than seven years post-termination (SD = 69.47 months).

Again, supervisee-initiated PTSRs were viewed as "professionally appropriate" sooner after termination of the
supervisory relationship than supervisor-initiated PTSRs. However, in both initiator conditions, 6% of the total sample reported that PTSRs with former supervisees would not be appropriate for almost 7 years after termination of the supervisory relationship. A t-test for paired samples was utilized to determine if there were any differences between time frames for when a supervisor-initiated PTSR would be professionally appropriate and when a supervisee-initiated PTSR would be appropriate. The results of this t-test revealed that 17 subjects responded to both questions and that the times when a supervisor-initiated PTSR (M = 89.47, SD = 76.76) and a supervisee-initiated PTSR (M = 89.94, SD = 76.19) might be appropriate were not significantly different.

The significant interaction effect, $F(5, 1755) = 426.76, p < .0001$, as seen in Figure 1, indicated that the ratings of appropriateness as a function of initiator did change differentially with the passage of time. More specifically, differences in ratings of appropriateness of supervisor-initiated PTSRs and supervisee-initiated PTSRs increased over time until the "after 2 years" time
Figure Caption

Figure 1. Mean ratings of professional appropriateness as a function of time and initiator.
Legend
- ■ S'or
- ▲ S'I'ee

Rating of exposure to general population

0-6 mos. 6-11 mos. 12-17 mos. 18-24 mos. After 2 yrs After 3 yrs

Time since termination
period, when the differences in the ratings began to drop slightly. Shortly after termination of the supervisory relationship, the differences in ratings of appropriateness between supervisor- and supervisee-initiated PTSRs was relatively small (.07), gradually increased over time to a difference of .26 at 12-24 months post-termination, and then fell to .25 at "after 2 years" and .24 at "after 3 years." These results indicated that engaging in a PTSR became more appropriate with the passage of time after termination of the supervisory relationship; that supervisee-initiated PTSRs were rated as more appropriate at each time period after termination of the supervisory relationship than supervisor-initiated PTSRs; and that the supervisor-initiated condition changed less over time than the supervisee-initiated condition.

Effects of Prior Sexual Involvements on Ratings

One purpose of this study was to explore the incidence of sexual relationships with former and current supervisors and former and current supervisees. A further purpose was to determine the effects of a history of a sexual relationship with a member of the supervisory dyad, time since termination of the supervisory relationship, and initiator of the PTSR on ratings of the professional appropriateness of engaging in a PTSR with a former supervisee.
Incidence of sexual involvement with a supervisor or supervisee. Of the 358 respondents, 6 (2%) did not respond to the questions about history of a sexual relationship with a member of the supervisory dyad; 33 (9%) reported a history of a sexual relationship with a member of the supervisory dyad; 18 (5%) reported a history of a sexual relationship with a former supervisor; 10 (3%) reported having had a sexual relationship with a current supervisor; 6 (2%) reported a history of a sexual relationship with a former supervisee; and 2 (1%) reported having had a sexual relationship with a current supervisee.

History of a sexual relationship with a member of the supervisory dyad. Given the small number of respondents who reported a history of a sexual relationship with a former supervisor, a current supervisor, a former supervisee, and a current supervisee, the statistical analysis focused on comparisons of the 33 respondents who reported a sexual history with a member of the supervisor dyad and 33 respondents randomly selected from the respondents who reported no such sexual history (N. Jones, personal communication, July 22, 1993; K. Strand, personal communication, July 22, 1993; Tabachnick & Fidell, 1983). Thus, in order to analyze the effects of initiator, history of a sexual relationship with a member of the supervisory dyad, and time since termination of the supervisory relationship on ratings of the professional appropriateness
of engaging in a PTSR with a former supervisee, a $2 \times 2 \times 6$ MANOVA was conducted on a total of 66 respondents' data (33 with a history of a sexual relationship and 33 with no history of a sexual relationship) (N. Jones, personal communication, July 22, 1993; K. Strand, personal communication, July 22, 1993; Tabachnick & Fidell, 1983). Table 2 presents means and standard deviations for ratings of the professional appropriateness of engaging in a PTSR with a former supervisee under two conditions of initiation (supervisor and supervisee), under two conditions of sexual history (a history or no history of a sexual relationship with a member of the supervisory dyad), and across six periods of time since termination of the supervisory relationship. Results indicated that, overall, across time, sexual history, and initiator conditions, PTSRs were rated between "undecided" and "somewhat inappropriate" ($M = 3.36$). Furthermore, the main effects for time and initiator were significant, a result similar to the previous $2 \times 6$ MANOVA. Thus, ratings of the professional appropriateness of engaging in a PTSR with a former supervisee did vary significantly as a function of initiator, $F(1, 64) = 12.87$, $p<.001$ and time $F(5, 320) =$
Table 2
Means and Standard Deviations of Ratings of Professional Appropriateness as a Function of Time, Initiator, and History of a Sexual Relationship

<table>
<thead>
<tr>
<th>Time Since Termination</th>
<th>Hist of Sex Rel.</th>
<th>0-5 mos.</th>
<th>6-11 mos.</th>
<th>12-17 mos.</th>
<th>18-24 mos.</th>
<th>After 2 years</th>
<th>After 3 years</th>
<th>Overall</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>M SD</td>
<td>M SD</td>
<td>M SD</td>
<td>M SD</td>
<td>M SD</td>
<td>M SD</td>
<td>M SD</td>
<td>M SD</td>
</tr>
<tr>
<td>Supervisor-Initiated</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No (n=33)</td>
<td>4.49 1.00</td>
<td>4.33 1.19</td>
<td>3.70 1.36</td>
<td>3.42 1.42</td>
<td>2.85 1.42</td>
<td>2.61 1.41</td>
<td>3.57 1.30</td>
<td></td>
</tr>
<tr>
<td>Yes (n=33)</td>
<td>4.36 1.14</td>
<td>4.09 1.28</td>
<td>3.55 1.39</td>
<td>3.12 1.45</td>
<td>2.58 1.44</td>
<td>2.42 1.37</td>
<td>3.35 1.35</td>
<td></td>
</tr>
<tr>
<td>Overall (n=66)</td>
<td>4.42 1.07</td>
<td>4.21 1.23</td>
<td>3.62 1.37</td>
<td>3.27 1.43</td>
<td>2.71 1.42</td>
<td>2.52 1.38</td>
<td>3.46 1.32</td>
<td></td>
</tr>
<tr>
<td>Supervisee-Initiated</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>No (n=33)</td>
<td>4.46 1.00</td>
<td>4.15 1.30</td>
<td>3.33 1.45</td>
<td>3.15 1.46</td>
<td>2.58 1.46</td>
<td>2.39 1.37</td>
<td>3.34 1.34</td>
<td></td>
</tr>
<tr>
<td>Yes (n=33)</td>
<td>4.27 1.21</td>
<td>3.94 1.37</td>
<td>3.42 1.52</td>
<td>2.97 1.57</td>
<td>2.33 1.45</td>
<td>2.15 1.37</td>
<td>3.18 1.42</td>
<td></td>
</tr>
<tr>
<td>Overall (n=66)</td>
<td>4.36 1.10</td>
<td>4.05 1.33</td>
<td>3.38 1.48</td>
<td>3.06 1.51</td>
<td>2.46 1.45</td>
<td>2.27 1.37</td>
<td>3.26 1.37</td>
<td></td>
</tr>
<tr>
<td>Overall</td>
<td>4.39 1.09</td>
<td>4.13 1.28</td>
<td>3.50 1.43</td>
<td>3.17 1.47</td>
<td>2.59 1.44</td>
<td>2.40 1.38</td>
<td>3.36 1.35</td>
<td></td>
</tr>
</tbody>
</table>

Note: Hist of Sex Rel. = History of a Sexual Relationship with a former or current supervisor or a former or current supervisee; S'or = supervisor; S'ee = supervisee; 1 = definitely appropriate, 2 = somewhat appropriate, 3 = undecided, 4 = somewhat inappropriate, 5 = definitely inappropriate.
96.10, \( p < .0001 \). However, the main effect for sexual history was not significant, and none of the interaction effects were significant. More specifically, as time since termination increased, PTSRs were rated as increasingly appropriate. During the first 5 months after termination, PTSRs were rated, on average (\( M = 4.39 \)), as somewhere between "somewhat inappropriate" and "definitely inappropriate." PTSRs continued to be rated as inappropriate for up to 24 months post-termination (\( M = 4.13 \) for 6-11 months post-termination; \( M = 3.50 \) for 12-17 months post-termination; \( M = 3.17 \) for 18-24 months post-termination). After 2 years post-termination (\( M = 2.59 \)) and after 3 years post-termination (\( M = 2.40 \)), PTSRs were rated as between "undecided" and "somewhat appropriate." Thus, even after three years post-termination, PTSRs just began to approach being rated as "somewhat appropriate." This basic pattern of change in ratings with the passage of time is similar to that found in the results of the previous MANOVA conducted to analyze the effects of time and initiator on ratings of the professional appropriateness of engaging in a PTSR with a former supervisee.

Post-hoc Scheffé analyses indicated that almost all of the differences in ratings between any one time period and each of the subsequent time periods were significant. Respondents rated PTSRs as significantly less appropriate 0-5 months post-termination (\( M = 4.39 \)) than each of the
subsequent time periods (6-11 months, $M = 4.13$; 12-17 months post-termination, $M = 3.50$; 18-24 months, $M = 3.17$; after 2 years, $M = 2.59$; and after 3 years, $M = 2.40$), $F(5, 320) = 96.10, p<.01$. Similarly, at each time period, PTSRs were rated as significantly less appropriate than PTSRs at any of the subsequent time periods, $F(5, 320) = 96.10, p<.01$. The only exception was that the difference in ratings of professional appropriateness of PTSRs between the "after 2 years" and "after 3 years" time periods was not significant.

The main effect for initiator was significant, $F(1, 64) = 12.87, p<.001$). The overall ratings of appropriateness for PTSRs for both supervisor-initiated ($M = 3.46$) and supervisee-initiated ($M = 3.36$) were somewhere between "undecided" and "somewhat inappropriate." However, at each time period, the supervisor-initiated PTSR was rated as significantly more inappropriate (0-5 months, $M = 4.42$; 6-11 months, $M = 4.21$; 12-17 months, $M = 3.62$; 18-24 months, $M = 3.27$; after 2 years, $M = 2.71$; after 3 years, $M = 2.52$) than supervisee-initiated PTSRs (0-5 months, $M = 4.36$; 6-11 months, $M = 4.05$; 12-17 months, $M = 3.38$; 18-24 months, $M = 3.06$; after 2 years, $M = 2.46$; after 3 years, $M = 2.27$).

The pattern of these results is similar to the previous 2 (initiator) x 6 (time since termination) MANOVA.

In contrast to the previous 2 (initiator) x 6 (time) MANOVA, the results of the 2 (initiator) x 2 (history of a
sexual relationship) x 6 (time) MANOVA did not reveal any significant interaction effects.

**Relevant Variables**

Respondents were asked to rate the relevance of five variables which might influence their decisions about the professional appropriateness of engaging in a sexual relationship with a former supervisee. The five variables to be rated included: (a) the stage of training of the supervisee, such as beginning practicum, advanced practicum, intern; (b) the emphasis of supervision, such as a focus on therapy, a more collegial relationship, or the supervisor as expert; (c) the length of the supervisory relationship; (d) the former supervisee's status as student or as graduate at the time the PTSR is initiated; and (e) the potential to have the former supervisee in another role, such as student or research assistant) in the future. The relevance ratings were made on a Likert scale, with 1 being "irrelevant," 2 being "somewhat irrelevant," 3 being "undecided," 4 being "somewhat relevant," and 5 being "very relevant." These relevance ratings were requested to further explore the variables considered important in making decisions about the professional appropriateness of PTSRs, not to determine the relationship between these variables and the actual ratings of the professional appropriateness of PTSRs. Thus, relevance ratings were analyzed utilizing descriptive statistics only. These results are presented in Table 3.
which shows the frequencies and percentages of relevance ratings for each variable at each point on the Likert scale. As indicated by the results, all of the variables listed were reported to be at least "somewhat relevant" by the majority of respondents. The potential to have the former supervisee in a future relationship, such as student or research assistant, was the variable most often reported as relevant, with 61.7% (n = 221) of the respondents rating it as "very relevant" and 14.5% (n = 52) of the respondents rating it as "somewhat relevant." At the same time, however, 19.3% (n = 69) of the respondents rated this variable as "irrelevant." The stage of training of the supervisee was reported as "very relevant" by 38.5% (n = 138) of the respondents and "somewhat relevant" by another 19.3% (n = 69) of the respondents. The former supervisee's status as student versus graduate at the time the PTSR is initiated was rated as "very relevant" by 38.0% (n = 136) of the respondents and "somewhat relevant" by 26.0% (n = 93) of the respondents. The emphasis of supervision variable was reported as "very relevant" by 29.3% (n = 105) of the respondents and "somewhat relevant" by 28.8% (n = 103) of the respondents. Finally, the length of the supervisory relationship was rated as "very relevant" by 20.9% (n = 75)
<table>
<thead>
<tr>
<th>Variables</th>
<th>Stage of training of S’ee</th>
<th>Emphasis of s’vision</th>
<th>Length of s’isory relationship</th>
<th>Former s’ee’s status</th>
<th>Potential to have S’ee in another role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relevance Irrelevant n %</td>
<td>122 34.1</td>
<td>102 28.5</td>
<td>47 27.1</td>
<td>86 24.0</td>
<td>69 19.3</td>
</tr>
<tr>
<td>Somewhat Irrelevant n %</td>
<td>23 6.4</td>
<td>30 8.4</td>
<td>46 12.8</td>
<td>29 8.1</td>
<td>5 1.4</td>
</tr>
<tr>
<td>Undecided n %</td>
<td>3 0.8</td>
<td>17 4.7</td>
<td>21 5.9</td>
<td>13 3.6</td>
<td>8 2.2</td>
</tr>
<tr>
<td>Somewhat Relevant n %</td>
<td>69 19.3</td>
<td>103 28.8</td>
<td>118 33.0</td>
<td>93 26.0</td>
<td>52 14.5</td>
</tr>
<tr>
<td>Very Relevant n %</td>
<td>138 38.5</td>
<td>105 29.3</td>
<td>75 20.9</td>
<td>136 38.0</td>
<td>221 61.7</td>
</tr>
</tbody>
</table>

Note: S’ee = supervisee; S’ee’s = supervisee’s; s’vision = supervision; s’isory = supervisory.
of the respondents and "somewhat relevant" by 33.0% (n = 118) of the respondents. The results also indicate that, though the majority of respondents did rate all of these variables as either "somewhat relevant" or "very relevant," between 19.3% and 34.1% of respondents reported each variable as "irrelevant." Relatively few (between 1.4% and 12.8%) of respondents rated the variables as "somewhat irrelevant" or were "undecided" (between 0.8% and 5.9%).

**Respondent-Generated Relevant Variables**

Further exploring variables affecting ratings of professional appropriateness of PTSRs, respondents were asked to report any factors not already listed in the survey which they considered important in determining the professional appropriateness of a PTSR with a former supervisee. These respondent-generated variables fell into seven different categories. The most commonly generated variable was the power differential between participants, with 116 (32.4%) of respondents reporting this as an important factor to consider. Other variables generated included transference issues (n = 36; 10.1%); the presence of psychopathology in either of the participants (n = 33; 9.2%); the ages of the participants (n = 24; 6.7%); whether or not one or both participants were married (n = 21, 5.9%); whether there had been a break in contact between the termination of the supervisory relationship and the beginning of the PTSR (n = 14; 3.9%); and whether or not the
parties had consulted with an objective third party or sought relationship counseling regarding entering into the PTSR (n = 6; 1.7%).

Anecdotal Information Volunteered by Respondents

Some respondents provided information above and beyond that requested in the survey. Of the 33 (9% of the total sample) respondents who reported a history of a sexual relationship with a member of the supervisory dyad, seven volunteered additional information about the outcomes of these dual relationships. One respondent reported having had a psychologist who, immediately after termination of therapy, became a personal friend, and then a supervisor. The respondent reported that a sexual relationship had occurred throughout and that the relationship was very destructive for her, resulting in her filing charges against the supervisor. Another respondent reported a sexual relationship with a former supervisor which began 2-1/2 years after termination of the supervisory relationship. This respondent reported that, though she thought the sexual relationship was fine at the time it occurred, she later felt that the sexual relationship was inappropriate because each individual had "transference-based" ideas about the other individual. In addition, she reported that she did not believe she was harmed by the dual relationship and that she and the other individual involved had become good friends. Finally, three respondents who reported a history
of a sexual relationship with a former supervisor and one respondent who reported a history of a sexual relationship with a former supervisee also reported that they were married to the individual with whom the sexual relationship had occurred. These marriages were described as healthy, longer-term relationships, some of which had lasted more than 20 years at the time of the survey.
CHAPTER V
DISCUSSION

The purposes of this study were to explore supervisors' judgements of the professional appropriateness of sexual relationships with former supervisees under two conditions of initiator (supervisor, supervisee) and six time frames after termination of the supervisory relationship; the incidence of sexual relationships between supervisors and former supervisees; the relationship between supervisors' own sexual relationships and their judgements of the professional appropriateness of sexual relationships between supervisors and former supervisees; and the factors which influence judgements of professional appropriateness of sexual relationships between supervisors and former supervisees.

Effects of Time and Initiator on Ratings

The most consistent and accurate results were for time and initiator variables on ratings of professional judgements of PTSRs. The findings of this analysis revealed that time since termination of the supervisory relationship, the initiator, and the interaction of time and initiator all affected ratings of the professional appropriateness of engaging in PTSRs with a former supervisee. Immediately
following termination of the supervisory relationship, PTSRs were rated as midway between "somewhat inappropriate" and "very inappropriate." However, with the passage of time, PTSRs gradually became more appropriate, until, after three years, they were rated somewhere between "undecided" and "somewhat appropriate." This general trend for PTSRs to become more professionally appropriate with the passage of time is similar to the finding by Lamb, et al. (under review) with regard to therapist-client PTSRs. However, while PTSRs were considered, at best, "somewhat appropriate" between supervisor-supervisee pairings after three years, Lamb, et al. (under review) reported that, for client-therapist pairings, PTSRs were judged to be "somewhat inappropriate" even after three years.

The finding that supervisor-initiated PTSRs are less appropriate than supervisee-initiated PTSRs parallels the finding by Lamb, et al. (under review) that therapist-initiated PTSRs are more inappropriate than client-initiated PTSRs. This finding is not surprising, considering that the Ethical Principles and the Ethics Code emphasize both the role and the responsibility of the therapist/psychologist, rather than the client/supervisee, in articulating the parameters of the professional relationship. Furthermore, the interaction of time and initiator on ratings of professional appropriateness of PTSRs is understandable given the potential for changing roles and increasing power
as the supervisee moves through the training program and becomes a professional psychologist.

The general result that, for the most part, PTSRs are considered inappropriate, may be a reflection of the perceived similarities between therapist-client relationships and supervisor-supervisee relationships, as well as the psychology profession's prohibitions against dual relationships. Furthermore, the view that therapist-client PTSRs are more inappropriate than are supervisor-supervisee PTSRs may reflect the psychology profession's more specific prohibitions with regard to therapist-client dual relationships, especially sexual relationships, and the relatively few guidelines regarding post-termination relationships between supervisors and supervisees.

Effects of Previous Sexual Relationships on Ratings

This study also explored the incidence of respondents' previous sexual relationships with former or current supervisors or supervisees and the effects of these histories on their ratings of the professional appropriateness of a PTSR with a former supervisee. Ratings were made under two conditions of initiator and six time frames post-termination. Of the 358 respondents, 352 responded to the questions about their own sexual history. Thirty-three (9%) reported a history of a sexual relationship with either a former or current supervisor or a former or current supervisee; 18 (5%) of the respondents
reported having had a sexual relationship with a former supervisor; 10 (3%) reported having had a sexual relationship with a current supervisor; six (2%) reported having had a sexual relationship with a former supervisee; and two (1%) reported having had a sexual relationship with a current supervisee. The frequencies of PTSRs with former supervisors (5%) and with former supervisees (2%) reported in this study are different than other available estimates of therapist-client PTSRs, which range from approximately 4% (Holroyd & Brodsky, 1977; Bouhoutsos, et al., 1983; and Borys & Pope, 1989) to 6.5% (Lamb, et al., under review) to approximately 11% (Akamatsu, 1988; Pope, et al., 1977).

There are a number of possible explanations for this discrepancy beyond the obvious differences that this study focused on supervisor-supervisee PTSRs, while the other studies cited focused on therapist-client PTSRs, and that the populations studied differ. First, the individuals who comprised this sample of psychologists involved in the supervision of psychologists-in-training may or may not be representative of the entire population of supervisors of psychologists-in-training. Second, the definitions and parameters of sexual relationships utilized in this study, though similar to that used in the Lamb, et al. (under review) study, were different than the definitions of sexual relationships or sexual involvements utilized in other studies. For example, Holroyd and Brodsky (1977) focused on
"erotic contact" with patients; Bouhoutsos, et al. (1983) reported on therapist-client "sexual involvement;" Borys and Pope (1989) utilized the term "engaging in sexual activity" in their survey regarding sexual and non-sexual dual relationships; and Akamatsu (1988) asked survey respondents if they had ever been involved in a "sexually intimate relationship" with a former client. These differences in terminology used to refer to sexual relationships may result in very different results, depending upon how research subjects choose to define the terms. A more useful approach might be to operationally define these terms. For example, Stake and Oliver (1991), in their survey concerning "the incidence of and psychologists' attitudes toward a range of touching and sexually suggestive behaviors" (p. 298), assessed more specific behaviors. They defined "sexually suggestive behaviors" as touching the shoulder, arm, or hand; touching the leg or knee; hugging; touching the face, hair, or neck; holding hands; holding client on their lap; use of sexual humor; suggestive looks or remarks; kissing; genital exposure; touching the breasts; fondling the genital area; oral sex; and intercourse. Thus, differences in terminology among different studies of sexual relationships may contribute to some of the differences in incidence rates.

A few patterns emerged from the data regarding time since termination, initiator, respondents' sexual histories,
and ratings of the professional appropriateness of engaging in a PTSR with a former supervisee. First, the ratings of the professional appropriateness of engaging in a PTSR with a former supervisee became less appropriate with the passage of time for both supervisor-initiated and supervisee-initiated PTSRs and for each condition of history of a sexual relationship. Furthermore, for the first five months after termination of the supervisory relationship, ratings of the professional appropriateness of a PTSR with a former supervisee were between "definitely inappropriate" and "somewhat inappropriate." Ratings of the professional appropriateness of PTSRs became more appropriate with the passage of time since termination, but under no condition were PTSRs ever rated as "definitely appropriate." Thus, even 3 years after termination of the supervisory relationship, ratings of the professional appropriateness of a PTSR with a former supervisee were between "somewhat appropriate" and "definitely appropriate." The main effect for time was significant; ratings of the professional appropriateness of engaging in a PTSR with a former supervisee at almost any time period was significantly different from the ratings at any other time periods. Thus, ratings of the professional appropriateness of engaging in a PTSR with a former supervisee changed significantly from one six-month period to the next six-month period.
A second general pattern was that supervisor-initiated PTSRs were rated as less appropriate than supervisee-initiated PTSRs at each time period and for each condition of sexual history.

The patterns that emerged from data based on the sexual history variables are interesting; however, due to the small number of respondents reporting a history of a sexual relationship with a current or former member of a supervisory dyad, the results of any analyses of this data must be considered tentative.

Other Relevant Variables Affecting Ratings

The 1992 Ethical Principles of Psychologists and Code of Conduct specified a number of factors which should be evaluated when considering engaging in sexual intimacies with a former client after the required two years post-termination. These variables included the amount of time since termination of therapy; the nature and duration of therapy; the client’s personal history; the circumstances of termination; the clients’ current mental status; the likelihood of adverse impact on the client and others; and any statements of actions the therapist made during therapy suggesting or inviting the possibility of a sexual or romantic relationship with the client after therapy. The results of this study suggest that a number of factors, including some of those specified in the Ethics Code (1993) with regard to engaging in sexual intimacies with former
clients, are important to consider when determining the professional appropriateness of engaging in a PTSR with a former supervisee. Factors reported to be at least "somewhat relevant" by participants in this study included the stage of training of the supervisee, the emphasis of supervision, the length of the supervisory relationship, the former supervisee’s status as student versus graduate at the time the sexual relationship is initiated, and the potential to have the former supervisee in another role in the future. However, between 19.3% and 34.1% of the respondents reported each of these variables as "irrelevant" when making judgements about the professional appropriateness of engaging in a PTSR with a former supervisee. One reason respondents may have rated these variables as "irrelevant" is their belief that PTSRs with former supervisees are inappropriate (or appropriate), regardless of these variables. Another possible explanation is that respondents might make judgements about the professional appropriateness of engaging in PTSRs with a former supervisee based entirely on other variables not rated for relevance in this study. For example, perhaps some of the respondent-generated variables (including the ages of the individuals involved, the power differential, whether either of the individuals is married, the presence of psychopathology in either of the individuals, transference issues, whether the individuals have sought consultation from an objective third party or
have sought relationship counseling prior to engaging in sexual intimacies, and whether there has been a break in contact between the end of the supervisory relationship and the beginning of a sexual relationship) were considered more relevant by respondents than the variables they were asked to rate.

Limitations

There are a number of limitations to this study which may affect the validity of the conclusions. First, the generalizability of the results may be questioned on the basis of the 37% return rate. Though anonymity was assured, the response rate may have been affected by the request for individuals to report on highly personal activities which may be perceived as controversial by some and unprofessional and/or unethical by others. In addition, the exploratory nature of the study, along with the systematic investigation of a number of variables simultaneously, resulted in a rather lengthy survey, and this, too, may have contributed to a less than optimal return rate. Though attempts were made to identify psychologists involved in the ongoing supervision of psychologists-in-training, the Association of Post-doctoral and Psychology Internship Center (APPIC) was unable to provide demographic information about supervisors at its internship sites, so there was no way to verify that the sample studied is representative of the population. Thus, interpretations based on the results of this study
must be tempered by the possibility that the sample is not representative of the population of psychologists involved in the ongoing supervision of graduate level psychologists-in-training at APPIC sites in the United States. Furthermore, though this survey was intended to be completed by licensed psychologists, who, in their professional role, evaluate the psychotherapeutic work of at least one practicum, internship, or post-doctoral level psychologist-in-training, or supervisee, the possibility exists that some responses may have come from psychologists who supervise trainees in other professional activities which might not be considered psychotherapy.

A second major limitation of this study centers around the validity of self-report information. There is no way to know if participants were telling the truth. Respondents may have given socially correct responses; their responses may have been shaped by memory distortions; or participants may have responded based on their perceptions instead of their actual behaviors.

A third limitation, as noted above, is that the number of respondents reporting a history of a sexual relationship with a former or current supervisor or former or current supervisee was extremely small compared to the number of respondents reporting no such sexual history. The difference in numbers of respondents with and without a history of a sexual relationship with a member of the
supervisory dyad made statistical comparisons difficult, and led to results which must be considered tentative.

Finally, the results of this study indicated that a number of variables are important to consider when determining the professional appropriateness of a PTSR with a former supervisee. However, due to the exploratory nature of this study, information about how these variables affect judgements of professional appropriateness of PTSRs with former supervisees requires further research.

**Directions for Future Research**

As stated previously, this study was exploratory in nature. Additional research is needed to provide more information about dual relationships in general, and sexual relationships in particular. One step is to attempt to replicate the results of this study. Another step is to further refine, or operationalize, the definition of a sexual relationship. Coming to a consensus about what constitutes a sexual relationship would permit different researchers to utilize the same definition and would contribute to a greater overall understanding of the dynamics of sexual relationships between members of the supervisory dyad.

In addition, future research should investigate systematically the impact of the variables reported in this study on judgements of professional appropriateness of PTSRs. For example, the impact of sexual relationships
between supervisory pairs on each of the individuals involved should be studied further, perhaps by using surveys specifically addressing this topic. More specifically, the impact of such relationships on subsequent attitudes about PTSRs and on involvement in PTSRs should be investigated, and the effects of role modeling of professionally appropriate and inappropriate behaviors on the attitudes and behaviors of psychologists-in-training could be studied further. Future research could also investigate the effects of PTSRs, including the differences between those PTSRs that are reported to be healthy and positive and those PTSRs that are reported to be damaging. Another interesting approach would be to include a personality inventory in any research on PTSRs, thus creating opportunities to study the relationships between personality and attitudes, beliefs, and behaviors related to PTSRs. More research on PTSRs may facilitate greater understanding of such relationships and greater specification of ethics regarding dual relationships.

Future research should employ a variety of different methodologies to obtain data about sexual relationships and to explore the issues noted above. For example, more qualitative research, perhaps utilizing more open-ended questions, more extensive questionnaires, and creating opportunities for follow-up telephone interviews would provide more in-depth information. Asking about attitudes,
beliefs, and behaviors also would provide additional, valuable information. In addition, a variety of sources of information should be utilized, since any one source of information is likely to have information unavailable to other sources. Third party reports may be an important source of information. Another approach might be to have state licensing boards require applicants to complete anonymous, confidential surveys which are qualitative in nature and focus on dual relationship issues. In addition, state boards of psychology might be able to gather more information about the previous sexual histories of the individuals they find to be in violation of the psychology profession's ethical guidelines regarding dual relationships, including sexual relationships. In this way, variables which may influence individuals to engage in dual relationships might be identified for further study.

An additional topic for future research in the psychology profession's opinion concerning policy guidelines and legislation. Although ethical principles cannot be established simply by majority opinion, the informed opinions of clinical supervisors and trainers may facilitate the development of more sound, workable guidelines regarding PTSRs between members of the supervisory dyad. Future research also could survey supervisor opinions concerning related topics, such as mandatory reporting, safeguards for
whistleblowers, investigative procedures, victim advocacy, and rehabilitation of abusers.

**Implications**

The results of this study indicated that time since termination of the supervisory relationship and whether the PTSR is initiated by the former supervisor or the former supervisee significantly affect psychologists' ratings of the professional appropriateness of engaging in a PTSR with a former supervisee. As time since termination of the supervisory relationship increased, PTSRs became more appropriate; however, even after 3 years since termination, PTSRs were not rated as appropriate. PTSRs initiated by the supervisor were consistently rated as less appropriate than PTSRs initiated by the supervisee. Though this study was exploratory, and results are tentative, this research has some important implications for the psychology profession.

The results may suggest that ethical guidelines prohibiting PTSRs between former supervisors and former supervisees. However, because of the tentative nature of the results, a blanket prohibition of PTSRs between members of the supervisory dyad may be more conservative than the views of many psychologists who function as clinical supervisors. Guidelines clearly are necessary and helpful; however, they should describe contingencies or circumstances that might be considered in determining the ethics of a particular case. A compromise such as this necessitates
making decisions on a case-by-case basis, but the task would be substantially easier if guidelines were clear to supervisors, supervisees, and the state boards or ethics committees.

The results of this study have implications for how the psychology profession decides when a dual relationship is unethical. The results suggest a number of variables that might be taken into account when the ethics of PTSRs are being determined. Some of these variables include time since termination; initiator of the PTSR; the stage of training of the supervisee; the emphasis of supervision; the length of the supervisory relationship; the former supervisee's current status; the potential to have the supervisee in another role in the future; the power differential between the two parties; transference issues; the presence of psychopathology in either of the parties; the ages of the participants; the relationship status of the parties; whether there had been a break in contact between the termination of the supervisory relationship and the beginning of the PTSR; and whether the parties had consulted with an objective third party or sought relationship counseling regarding entering into the PTSR.

Finally, given the current interest in dual relationships, in sexual relationship issues, and in sexual harassment issues, an innovative approach might be to form a special task force concerned about these issues. This task
force might be charged with conducting research on the issue of dual relationships, sexual relationships, and sexual harassment; publicizing the results of their studies; providing education and training to professionals and professionals-in-training; providing consultations with "experts" on these issues; and facilitating greater understanding of dual relationships in general, and sexual relationships in particular.

**Conclusion**

The major results of this exploratory study suggested that time since termination of the supervisory relationship, initiator of the PTSR, and the interaction of the time and initiator variables significantly affected ratings of the professional appropriateness of engaging in a PTSR with a former supervisee. More specifically, as time since termination of the supervisory relationship increased, ratings of the professional appropriateness of engaging in a PTSR with a former supervisee became significantly more appropriate; supervisor-initiated PTSRs were rated as significantly less appropriate than supervisee-initiated PTSRs; and the ratings for the supervisor-initiated PTSR changed less over time than the ratings for the supervisee-initiated PTSR.

The incidence of a history of a sexual relationship with a former or current supervisor or a former or current supervisee and the effects of such a history on ratings of
the professional appropriateness of engaging in a PTSR with a former supervisee also were explored in this study. Out of a total of 358 participants, 33 (9%) reported a history of a sexual relationship with a member of the supervisory dyad. However, the respondents' sexual history did not have a significant effect on their ratings of the professional appropriateness of engaging in a PTSR with a former supervisee. Though these results are tentative, they provide impetus for more attention to the issue of PTSRs.

Clearly, this study is only the beginning. The issue of dual relationships is a difficult one for the psychology profession at this time. Though the newly revised Ethical Principles and Code of Conduct (1992) provides more detailed guidelines about dual relationships, there continue to be many differing views and many questions about different types of dual relationships. Thus, at a time when the psychology profession seems very invested in the issue of dual relationships, especially sexual relationships, this exploratory study provides some important information regarding the effects of time since termination of the supervisory relationship and initiator on the professional appropriateness of PTSRs with a former supervisee. The information provided by this study should be utilized to facilitate more research and education in the area of dual relationships. Only with increased attention, such as that provided by this study, will the psychology profession be
able to more fully address the complicated issues regarding dual relationships, especially sexual relationships.
References


California Civil Code section 43.93.


Colorado State Board of Medical Examiners v. Weiler, 244, 402 P.2d 606 (Colo 1965).


Florida Admin Code, Sec 21U-15.004(5)(a) (1986)


Wisconsin Act 434, 1983.

*Zipkin v. Freeman*, 436 S.W. 2d 753 (Mo. 1968).
APPENDIX A

COVER LETTER TO APPIC TRAINING DIRECTORS
Dear Training Director,

May 24, 1992

I am asking for your assistance in obtaining subjects for my dissertation study, which is designed to investigate several aspects of supervisors' relationships with former supervisees. This study parallels recent research regarding the issue of the professional appropriateness of therapists' relationships with former clients, a very controversial topic in the psychology profession. I am interested in several aspects of this issue, such as the incidence of supervisor-former supervisee sexual relationships, psychologists' judgments of the professional appropriateness of such relationships, and the factors which influence these judgments.

Survey packets are being sent to the training directors at each of the APPIC sites. I respectfully request a few minutes of your time and your assistance in making this survey available to two randomly selected licensed psychologists in your agency who, in their professional role, evaluate the psychotherapeutic work of at least one practicum, internship, or post-doctoral (first year after graduation with doctorate) level psychologist-in-training, or "supervisee."

I have enclosed two research packets for distribution to potential subjects, preferably one female and one male. Each packet includes a cover letter explaining the purpose of the study, a questionnaire, a return reply envelope, and a form for requesting the results of this research. Completion of the survey should take only 15 minutes.

Due to the sensitivity of the topic of this study, participation is voluntary, all responses will be anonymous and confidential, and respondents are free to discontinue their participation in this study at any time. Please note that having a male and a female respondent from each site is an ideal; if two males or two females from your site are willing to participate, please distribute the packets accordingly.

Completed surveys should be returned within two weeks of respondents' receipt of the survey packets.

I am aware that you probably are extremely busy, yet I see this as a very important issue. Only by hearing from other professionals can the issue of dual relationships be understood more completely.

Thank you in advance for your participation. Questions can be directed to Judy Ronan Woodburn at the address or phone number on this letter.

Sincerely,

Judy Ronan Woodburn, M.A.
The Ohio State University
I respectfully request your assistance in gathering data for my dissertation study, which is designed to investigate several aspects of supervisors' relationships with former supervisees. This study parallels recent research regarding the issue of the professional appropriateness of therapists' relationships with former clients, a very controversial topic in the psychology profession. I am interested in several aspects of this issue, ranging from the incidence of supervisor-former supervisee sexual relationships to psychologists' judgments of the professional appropriateness of such relationships. Due to the sensitive nature of this topic, participation is voluntary, all responses will be anonymous and confidential, and you maintain the right to discontinue participation at any time.

You have been identified as a licensed psychologist who, in your professional role, evaluates the psychotherapeutic work of at least one practicum, internship, or post-doctoral (first year after graduation with doctorate) level psychologist-in-training, or "supervisee." I am requesting that you give approximately 15 minutes of your time to complete the enclosed survey, which deals with your experiences with former supervisees. I recognize that you probably are extremely busy, yet I believe that this is a very important professional issue. Please complete the survey (remember that all responses are anonymous and confidential) carefully and in order of presentation, and return to me within two weeks of your receipt of this packet. I have enclosed a return reply envelope for your convenience.

Only by hearing from psychologists like you can we hope to get a better understanding of this complex issue. I hope that completing this survey will be helpful to you as you consider these issues in your own professional work.

Thank you in advance for your participation. Any questions can be directed to Judy Ronan Woodburn at the address or phone number on this letter. If you are interested in a summary of the results, please complete the attached request and, in order to maintain anonymity, return to me under separate cover.

Sincerely,

Judy Ronan Woodburn, M.A.
The Ohio State University
Please send a summary of the results of the study on "Relationships with Former Supervisees" to:

Name________________________

Address_____________________

___________________________

Send this request to:

Judy Ronan Woodburn, M.A.
Student Counseling Center
Illinois State University
56 DeGarmo Hall
Normal, IL 61761
APPENDIX C

QUESTIONNAIRE
I. DEMOGRAPHICS

A. Gender: Male _____ Female _____

B. Age: _____ years

C. Race/Ethnicity:
   3. Caucasian _____  4. Hispanic _____
   6. Other (please specify) _______________________________________

D. Relationship status:
   1. Single _____  2. Partnered _____
   5. Divorced _____  6. Widowed _____
   7. Other (please explain) _______________________________________

E. How many years have you delivered psychotherapeutic services as a psychologist? _____ years
   In what state do you currently practice?
   Are you licensed/registered as a psychologist in at least one state?
      Yes _____ No _____

F. How many years have you been involved in the supervision of psychology graduate trainees at the following levels of professional development?
   1. Practicum level _____ years
   2. Internship level _____ years
   3. Post-doctoral (1st year after graduation with doctorate) _____ years

G. Indicate with "1" your primary work setting and indicate with "2" your secondary work setting.
   1. Private practice _____  2. University Counseling Center _____
   3. State Hospital _____  4. VA Hospital _____
   5. Medical Center _____  6. Community Mental Health Center _____
   7. Other (please specify) _______________________________________

H. What is your professional identification?
   1. Clinical Psychologist _____  2. Counseling Psychologist _____
   3. Other (please specify) _______________________________________

I. Highest degree obtained:
   5. Other (please specify) _______________________________________
II. In the following questions you will be asked to rate the professional appropriateness of engaging in a sexual relationship with a former supervisee as a function of length of time since termination of the supervisory relationship and as a function of who initiates the sexual relationship. For the purposes of this study, assume: (1) a sexual relationship is characterized by physical and/or non-physical expressions of sexuality (e.g., any form of intimate sexual contact, such as kissing, fondling, or intercourse, or non-physical communications of sexual intent and/or desire); (2) "supervisee" refers to a psychology graduate trainee at the practicum, internship, and/or post-doctorate (first year after graduation with doctorate) level; (3) "supervisor" refers to a psychologist who, in his/her professional role, evaluates the psychotherapeutic work of a graduate level psychologist-in-training, or "supervisee;" (4) the supervisee is the gender to whom the supervisor is most physically attracted; and (5) termination of the supervisory relationship was "appropriate and uncomplicated." You will notice that, in the rating scale, the term "professionally appropriate" is used rather than the term "unethical," since, for purposes of this study, "unethical" refers to practices actually articulated within the Ethical Principles of Psychologists.

A. For each of the time frames listed below, circle the number which reflects your rating of the degree to which developing a sexual relationship between the supervisor and a former supervisee is professionally appropriate. Respond under the assumption that the former supervisor initiates the sexual relationship.

<table>
<thead>
<tr>
<th>Time Frame after Supervision</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-5 months</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>5-11 months</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>12-17 months</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>18-24 months</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>After 2 years</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>After 3 years</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
</tbody>
</table>

7) If you viewed the relationship as inappropriate after 3 years (that is, either "4" or "5"), would there be any time after which the development of this type of relationship would be "professionally appropriate"?

Yes____  If yes, when?____ No____
B. You answered the above series of questions with the assumption that the former supervisor initiated the sexual relationship. Now, assume that the former supervisee initiated the sexual relationship. Complete the ratings provided below for the various time periods under this condition of "former supervisee initiated."

<table>
<thead>
<tr>
<th>Time Frame after Supervision</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) 0-5 months</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>2) 6-11 months</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>3) 12-17 months</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>4) 18-24 months</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>5) After 2 years</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>6) After 3 years</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
</tbody>
</table>

If you viewed the relationship at inappropriate after 3 years (that is, either "4" or "5"), would there be any time frame after which the development of this type of relationship would be "professionally appropriate"?

Yes____   If yes, when?______   No____

III. There are a number of other factors which might influence your decision about the professional appropriateness of engaging in a sexual relationship with a former supervisee. A few of these factors are listed below. Please indicate the relevance of each of these variables as they might influence your judgement as to the professional appropriateness of engaging in a sexual relationship with a former supervisee. Please circle a "1" if this variable is not at all relevant, a "2" if it is somewhat irrelevant, a "3" if undecided, a "4" if the variable is somewhat relevant, and a "5" if it is very relevant.
<table>
<thead>
<tr>
<th>Variables</th>
<th>Relevance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stage of training of supervisee (ex: beginning practicum, advanced practicum, intern)</td>
<td>1 2 3 4 5</td>
</tr>
<tr>
<td>Emphasis of supervision (ex: therapy vs. collegial vs. expert)</td>
<td>1 2 3 4 5</td>
</tr>
<tr>
<td>Length of supervisory relationship</td>
<td>1 2 3 4 5</td>
</tr>
<tr>
<td>Former supervisee’s status as student vs. graduate at the time the relationship is initiated</td>
<td>1 2 3 4 5</td>
</tr>
<tr>
<td>Potential to have the former student in another role (student, research assistant, etc.) in the future</td>
<td>1 2 3 4 5</td>
</tr>
</tbody>
</table>

B. Are there any other factors, aside from who initiates and time since termination of the supervisory relationship that you feel are important in determining professional appropriateness. If yes, please elaborate.
IV. Please contribute to greater understanding this complex issue of former supervisor-supervisee relationships by responding to the following questions. Remember that all responses are completely anonymous. Also, please note that some of these questions have several parts; please read carefully and respond to each part.

A. Reflect on your experiences as a psychology graduate trainee and your relationships with your supervisors when responding to these questions.

1. Have you ever had a sexual relationship with a former supervisor (that is, the sexual relationship occurred after the supervisory relationship had ended)?
   No____ Yes____ If yes, with how many former supervisors?____
   If yes, for each relationship, please indicate the length of time between termination of the supervisory relationship and initiation of the sexual relationship.
   Relationship 1: ____________________________
   Relationship 2: ____________________________
   Relationship 3: ____________________________
   Relationship 4: ____________________________
   Relationship 5: ____________________________

2. Have you ever had a sexual relationship with a current supervisor (that is, the sexual relationship occurred during the supervisor-supervisee relationship)?
   No____ Yes____ If yes, with how many current supervisors?____

B. Now, reflect on your work as a supervisor and your relationships with your supervisees when responding to these questions.

1. Have you ever had a sexual relationship with a former supervisee (that is, the sexual relationship occurred after the supervisory relationship had ended)?
   No____ Yes____ If yes, with how many supervisees?____
   If yes, for each relationship, please indicate the length of time between the termination of the supervisory relationship and the initiation of the sexual relationship.
   Relationship 1: ____________________________
   Relationship 2: ____________________________
   Relationship 3: ____________________________
   Relationship 4: ____________________________
   Relationship 5: ____________________________

2. Have you ever had a sexual relationship with a current supervisee (that is, the sexual relationship occurred during the supervisor-supervisee relationship)?
   No____ Yes____ If yes, with how many supervisees?____

THANK YOU FOR YOUR TIME AND PARTICIPATION!