

PSYCHOEDUCATIONAL PROCESS GROUP · FACILITATOR GUIDE

Holding What People Tell Us

Confidentiality, HIPAA, and FERPA in the life of a therapist

A 75-minute group, co-led by two supervisees for the supervisee cohort

Before you read anything else

You are not being asked to teach a compliance class. The cohort has already completed the HIPAA and FERPA module and the federal trainings. They know the rules. What they have not done is talk to each other about what it is actually like to carry other people's information.

That is the group you are running. It is psychoeducational because there is a short teaching segment; it is a process group because most of the time is spent on what members bring. The teaching exists to open the door. It is not the room.

The most common mistake: new facilitators fill the whole 75 minutes with content because content is safe and silence is not. If you find yourself explaining a fourth exception to the consent rule, stop and ask a question instead.

Purpose

To give supervisees supervised practice co-leading a psychoeducational process group, using material they already know well, so that the learning edge is facilitation rather than content. And to let a cohort of new clinicians discover that the discomfort of holding confidences is shared, normal, and workable.

Learning objectives

By the end of this group, participants will be able to:

1. Distinguish which privacy framework governs a record based on who holds it and what kind of record it is.
2. Identify at least two situations in their own current caseload where the HIPAA and FERPA frameworks intersect.
3. Describe the emotional pressures that push clinicians toward over-disclosure, and name their own.
4. State one specific practice change they will make as a result of the group.

By the end of this group, the co-facilitators will be able to:

1. Establish and maintain group agreements, including confidentiality about the group itself.
2. Move a group between didactic and process modes without losing either.
3. Manage a dominating member and invite a silent one without shaming either.

4. Close a group with containment rather than with the clock.

Preparation

Two weeks out

- Confirm your co-facilitator, the date, and the room or video link with the Internship Coordinator.
- Both facilitators complete the HIPAA and FERPA training module in full, including the external federal trainings.
- Read this guide all the way through. Do not skim the process prompts — they are the part you will need most.

One week out

- Meet with your co-facilitator for at least 45 minutes. Divide the segments. Decide who opens, who teaches, who leads the process segment, who closes.
- Agree on hand-off signals. A phrase you both know, so the transfer looks intentional rather than accidental. Something as plain as “I want to bring my co-facilitator in here” works.
- Agree on what you will do if a member discloses something that requires follow-up outside the group — a possible privacy breach, a client-safety concern, or distress that exceeds the group’s purpose.
- Review your plan with your clinical supervisor. Bring the divided agenda, not a vague description.

The day before

- Reread the process prompts. Pick your three primary ones and mark two backups.
- Prepare the room: chairs in a circle, no table between people if you can avoid it, water available, a visible clock that is not your phone.
- If the group meets by video: test the link, confirm every participant is joining from a private space, and plan how you will use the chat function — or whether you will disable it.

Materials

- This guide, printed, with your notes on it.
- A whiteboard or shared screen for the teaching segment.
- Blank paper and pens for the application segment.
- The self-reflection form at the back of this guide, one copy per facilitator.

A note on co-facilitation: two people taking turns is not co-facilitation. While your partner leads, your job is the room — who has gone quiet, who is about to speak, who just flinched. Say what you notice. A co-facilitator who observes well makes the leading facilitator twice as effective.

The group at a glance

Segment	Time	Mode	Purpose
Opening & agreements	10 min	Structured	Establish safety and the frame
Grounding & check-in	10 min	Structured	Regulate; get every voice in the room early
Teaching segment	15 min	Didactic	Sharpen the one distinction people get wrong
Process segment	25 min	Process	The heart of the group
Application	10 min	Structured	Convert insight into a specific action
Closing	5 min	Structured	Containment before people leave

If you are running behind: cut the teaching segment, never the closing. A group that ends unclosed sends people back to clients while still activated. That is a real harm, and it is entirely avoidable.

Segment 1 · Opening and group agreements

10 minutes · Structured

What you are doing here

Setting the frame. Everything that happens in the next hour depends on whether people believe this room is safe. You establish that in the first ninety seconds, mostly through how settled you seem.

Suggested opening

"Thank you all for being here. I'm ___ and this is ___, and we're co-facilitating today. We're both supervisees, same as you — this is a leadership experience for us, and we'd rather be honest about that than pretend otherwise. Today's group is about confidentiality: HIPAA, FERPA, and what it actually feels like to be the person holding what someone told you. You've all done the reading. We're not going to re-teach it. We want to talk about the harder part."

Group agreements

Offer these, then invite additions. Do not rush this; the group is watching how seriously you treat your own frame, and this is the topic on which hypocrisy would be most obvious.

- What is said here stays here. Members may take away their own learning and their own words, but not anyone else's.
- No identifying client information. If an example is needed, change everything that could identify anyone, and say that you have.
- Speak from your own experience, not about someone else's.
- You may pass. Silence is a legitimate contribution.
- Disagreement is welcome. Contempt is not.
- If something in the group needs to go further — a possible breach, a safety concern — the facilitators will follow up outside the group, and we will tell you we are doing it.

"What would you add? What do you need from this room in order to say something real in it?"

Notice the recursion: you are asking a group to agree on confidentiality rules in a group about confidentiality rules. Name that out loud. It is the single best teaching moment in the whole 75 minutes and it costs you nothing.

Segment 2 • Grounding and check-in

10 minutes · Structured

Grounding (3–4 minutes)

Brief and unfussy. The goal is to move people out of whatever they were doing before they walked in. Choose one:

- Three slow breaths with a longer exhale than inhale, done together, without commentary.
- Feet on the floor, notice three points of contact with the chair, notice one sound in the room.
- Sixty seconds of silence with the instruction simply to arrive.

Do it with them. A facilitator who narrates a grounding exercise while visibly not doing it teaches the group that these things are for clients.

Check-in (6–7 minutes)

One sentence each. Go around; do not leave it open, or two people will take the whole segment.

“One sentence each. Not how your week was — rather: what is one word for how you arrive to a conversation about confidentiality? Curious, tired, anxious, bored, guilty, whatever it is. One word, and if you want, one sentence about why.”

Facilitator note: the word “guilty” shows up in almost every one of these groups. If it appears, do not chase it yet. Note it, hold it, and bring it back in the process segment. Something like: “Someone said guilty earlier. I want to come back to that now.”

Segment 3 • Teaching segment

15 minutes · Didactic

Cover exactly this, and no more

Fifteen minutes is enough for one idea taught well. The idea is that the law governing a piece of information depends on the record it lives in and who is holding that record — not on what the information says.

The record	Who holds it	Which law applies
Your progress note on a 12-year-old client	Orchard	HIPAA
The same content, in a letter you sent the school	The school district	FERPA
The school counselor's notes on that student	The school district	FERPA
An IEP naming counseling as a related service	The school district	FERPA, plus IDEA
Your note on a 20-year-old college client	Orchard	HIPAA
The campus counseling center's note on her	The university	FERPA treatment records

Draw out the implication

“Look at rows one and two. Same clinical information. Different law, different rights, different list of people who can read it — and the only thing that changed is that you put it in an envelope. So: what have you promised a parent about where your letter will go? And was that promise yours to make?”

Two distinctions worth thirty seconds each

- Psychotherapy notes under HIPAA and sole possession records under FERPA are not the same thing, and neither is as protective as people assume. Both lose their status the moment the note is shared.
- HIPAA is a floor. Georgia law and board rules can be stricter, and where they are, they win.

Do not: run through the consent exceptions, recite regulatory citations, or answer a technical question at length. If someone asks a detailed compliance question, say “that’s a good supervision question and I don’t want to guess” and move on. Modeling that is worth more than the answer.

Segment 4 • Process segment

25 minutes · Process · The core of the group

Pick three prompts. Do not try to use them all. Let a prompt run as long as it is producing something, and move on when it stops. Silence after a prompt is normal; count to ten before you rescue it.

Prompt set A • The pull to say more

“Think of a time — in placement, in a practicum, in any helping role — when you wanted to tell someone something you could not tell them. A parent, a teacher, a colleague, your own family. What made you want to? What did you do with that?”

Follow-ups:

- What did it cost you to hold it?
- Who did you want to protect — the client, or the person asking, or yourself?
- Has anyone here actually said too much? What happened next?

Prompt set B • The loneliness of it

“There’s a particular kind of tired that comes from knowing things you can’t say. Some of you named it in check-in. What do you do with what you carry home?”

Follow-ups:

- Where does it go if it does not go into supervision?
- What have you found that actually helps — not what you have read helps?
- Is there a difference between holding a confidence and holding it alone?

Prompt set C • Confidentiality as care, not compliance

“We mostly learn confidentiality as a rule we could break. Try it the other way: what does it mean to a client that you can be trusted with this? What is confidentiality doing therapeutically, not legally?”

Follow-ups:

- Who in your own life held something of yours well? What did that do?
- How does it change your intake conversation if privacy is an offering rather than a disclaimer?
- What is lost when we read the limits of confidentiality as a formality?

Prompt set D • When the rules feel wrong

“Has there been a moment when following the rule felt like the wrong thing to do — when withholding felt like abandoning someone? What did you do with that?”

Handle with care: this prompt is the most productive and the most likely to surface a real disclosure that needs follow-up. Use it only if the group is going well and you have time to close properly. If someone describes something that may have been an actual breach, do not process it in the group — acknowledge it, thank them, and tell them you will follow up afterward. Then actually do.

Managing the room

These are the four situations that come up. Read them before you facilitate; you will not have time to look them up mid-group.

The member who dominates

Usually anxious rather than self-important. Do not shut them down; redistribute.

"That's a lot in it — I want to hold onto it and hear whether it lands for anyone else. Who else has been somewhere like that?"

The member who says nothing

Invite without spotlighting. Never go around the circle to force a response.

"I'm going to leave some space here in case anyone who hasn't spoken wants to. No pressure at all — sometimes it's just useful to know the door's open."

It turns into a legal Q&A

Common, and it is avoidance — answering technical questions is more comfortable than feeling things. Name the shift kindly.

"I notice we've moved into the technical questions, and those are real — let's park them for supervision. I want to go back to what ___ said a minute ago, because I don't think we finished with it."

Someone becomes genuinely distressed

Slow down. Do not turn the group into their therapy, and do not abandon them either.

- Acknowledge directly and without alarm. Offer a breath, offer the option to pass.
- Ask whether they want to stay with it briefly or move on. Honor the answer.
- Your co-facilitator holds the room while you attend to the person.
- Follow up individually after the group. Every time. Tell your supervisor.

Remember: you are a supervisee facilitating peers. You are not responsible for resolving what surfaces. You are responsible for noticing it, holding it steadily, and handing it to your supervisor.

Segment 5 • Application

10 minutes · Structured

Insight evaporates. A named commitment does not, especially when it is said aloud to peers.

“Take two minutes and write down one thing you’ll do differently. Specific. Not ‘be more careful’ — something you could actually be caught doing. Then we’ll go around and each say ours.”

If people struggle to be concrete, offer examples:

- “I’m going to check the expiration date on every release before I send anything.”
- “Before my next IEP meeting I’m going to ask the family what they don’t want shared.”
- “I’m going to stop taking session notes on my phone.”
- “I’m going to say ‘I can’t confirm that’ out loud until it stops feeling rude.”
- “I’m going to bring the thing I’ve been carrying to supervision this week.”

Facilitators commit too. Say yours last, and make it real. A facilitator who exempts themselves from the exercise has just taught the group that it was a formality.

Segment 6 • Closing

5 minutes • Structured • Do not cut this

People are about to leave this room and see clients. Your job in these five minutes is to return them to a settled state and to close the frame you opened.

- Reflect back one or two themes you actually heard. Not a summary of the content — a summary of the room.
- Restate the confidentiality agreement about the group itself.
- Say plainly that anything needing follow-up should go to their supervisor, and that you are available afterward.
- A brief closing round: one word for how they are leaving.
- Thank them. Mean it. They gave you a room to practice in.

"What I heard today was ___ and ___. What we said at the start still holds — your own learning is yours to take, everyone else's words stay here. If something came up that needs to go further, take it to your supervisor, and either of us is around afterward. Let's close with one word for how you're leaving."

Then, immediately after: the two of you debrief together for ten minutes before you do anything else. What worked, what you would change, what you noticed in each other. Write it down while it is fresh — the self-reflection below is much harder to complete three days later.

Facilitator self-reflection

Complete within 24 hours of facilitating. Bring to your next supervision session.

Facilitator: _____ **Co-facilitator:**

Date of group: _____ **Number of participants:** _____

1. What went well? Be specific — name a moment, not a quality.

2. Where did you lose the room, or feel that you were losing it? What did you do?

3. What did you notice in yourself — physically, emotionally — during the process segment?

4. How did you and your co-facilitator work together? What would you change about the pairing?

5. Was there a moment you avoided? What made you avoid it?

6. Did anything surface that requires follow-up outside the group? What have you done about it?

7. What is one thing you will do differently the next time you facilitate?

Supervisor observation and sign-off

Completed by the clinical supervisor after observation or after debriefing with the facilitator.

Supervisee: _____ **Date:** _____

Rating scale: 1 = not yet demonstrated · 2 = emerging · 3 = competent · 4 = proficient · N/A = no opportunity to observe

Competency	Rating	Comment
Established group agreements clearly and unhurriedly		
Created and maintained psychological safety		
Delivered the teaching segment accurately and concisely		
Moved between didactic and process modes with intention		
Used silence rather than filling it		
Redistributed participation from a dominating member		
Invited a quiet member without spotlighting them		
Recognized and named avoidance in the group		
Responded appropriately to participant distress		
Worked as a genuine pair with the co-facilitator		
Closed the group with containment		
Identified and escalated matters requiring follow-up		
Demonstrated accurate working knowledge of HIPAA and FERPA		
Recognized the limits of own scope; deferred appropriately		

Strengths observed

Growth areas and specific next steps

This supervisee has satisfactorily completed the co-facilitation requirement of the HIPAA and FERPA training module.

Supervisor signature: _____ **Date:** _____

Printed name and credentials: _____

License number: _____ **Supervision hours credited:** _____

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