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Ethical Gatekeeping for LPC Supervisors

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Counseling supervisors have an ethical responsibility to be gatekeepers to the profession and to protect the public from harm. When a Licensed Professional Counselor – Supervisor (LPC-S) in Louisiana is not also the Provisional Licensed Professional Counselor's (PLPC) on-site supervisor, insight regarding the PLPC's behaviors may be lacking and therefore decreases the ability of the LPC-S to identify potential remediation areas. The author presents a method to help supervision only LPC-Ss ensure their gatekeeping responsibilities through consented communications with on-site administrative supervisors.

Keywords: counselor supervision, gatekeeping, gateslipping

Ethical Gatekeeping Strategies for LPC Board Approved Supervisors

Gatekeeping is often viewed as a process to protect the public by limiting or stopping anyone who would potentially cause harm to others in the process of their professional duties. For the purpose of this article, gatekeeping will be defined as "...the responsibility of all counselors, including student counselors, to intervene with professional colleagues and supervisors who engage in behavior that could threaten the welfare of those receiving their services" (Foster & McAdams, 2009, p. 271). The role of gatekeeping within many professions often lies within the education and training of professionals as well as with the post training supervision by an experience, credentialed, and trained veteran of the profession. Within the counseling profession, counselor educators have been assigned a role as gatekeepers within graduate training programs. In particular, guidelines established by the Council for Accreditation of Counseling and Related Educational Programs (CACREP), which accredits graduate programs (masters and doctorate), dictate the role of gatekeeping of counselor educators (CACREP, 2009, Section 1, Standard P). Additionally, the American Counseling

Association Code of Ethics (2014) also identify the role of gatekeeping within counseling supervision, which can be attributed to supervision during and after graduate training (Code F.6.b). Beyond the responsibility of supervisors, the ACA Code of Ethics also identifies the importance of not only counselors self-monitoring for impairment but also the responsibility of colleagues to intervene when a counselor is showing signs of impairment that could cause harm to clients (Code C.2.g).

Researchers in the counseling field have brought up concerns regarding the concept of gateslipping, which refers to "...potentially deficient trainees..." completing a graduate program in counselor education without receiving necessary remediation (Gaubatz & Vera, 2006, p. 32).

The concept of gateslipping can also be applied to post-graduate deficient, impaired, or problematic counselors working towards independent licensing without either necessary remediation or intervention. Researchers in counselor education have identified different terminology for the identification of counselors, in particular counseling students, who may be impaired. For example, Kress and Protivnak (2009) recommended referring to trainees

exhibiting concerning behaviors as “problematic” versus “impaired”. Kress and Protivnak explained that the term impaired could result with some ethical or legal repercussions for graduate training programs. Additionally, Rusk, Raskin, and Hills (2009) suggested the phrase of trainees with problems of professional competence (TPPC) to help address concerning behaviors of trainees. Although researchers within the counseling profession have identified the significant concern about TPPCs and/or the role of counselor educators as gatekeepers (Kress & Protivnak, 2009; Rusk, Raskin, & Hills, 2009), little has been written regarding the potential for licensing supervisees with problems of professional competence. The purpose of this article is to address steps that Louisiana Licensed Professional Counselor – Supervisors can take to ensure appropriate gatekeeping procedures and reduce the potential for gateslipping among Provisionally Licensed Professional Counselors.

Current state of Licensed Professional Counselor Supervision in Louisiana

As of April 24, 2015, there were approximately 970 Counselor Interns, now referred to solely as Provisionally Licensed Professional Counselors (PLPCs), in Louisiana registered with the LA LPC board of examiners and actively receiving supervision from an LPC Board Approved Supervisor (Licensed Professional Counselor – Supervisor [LPC-S]) (LA LPC Board Administrators, personal communication, April 24, 2015).

There were also approximately 779 LPC-Ss, of which 250 are active in the supervision of PLPCs (LA LPC Board Administrators, personal communication, April 24, 2015). Any PLPC and LPC-S are obligated to follow the statutes outlined in the Louisiana

Professional and Occupational Standards, Title 46, Part LX, Subpart 1.

In order to provide adequate and timely clinical assistance, PLPCs must work at a setting where there is at least one licensed mental health professional (i.e. Licensed Psychologist, Licensed Clinical Social Worker [LCSW], Licensed Marriage and Family Therapist [LMFT], Licensed Professional Counselor [LPC], etc.) present to help with case consultation, if needed (§603.6.h Provisional Licensed Professional Counselors Licensing Requirement). PLPCs must also have an administrative supervisor as well (§603.6.f Provisional Licensed Professional Counselors Licensing Requirement), which can be the same as the LPC-S (if provided at the work setting) or the other licensed mental health professional outlined in the previous sentence. Therefore, a PLPC may have up to three administrative/supervisory personnel: 1) the Board Approved LPC-S; 2) an administrative supervisor at the work setting; and 3) a licensed mental health professional; however, one individual may meet all three roles.

Licensing Supervisors as Gatekeepers

Licensed Professional Counselor – Supervisors in Louisiana are able to work with PLPCs through individual and group supervision. Although supervision often includes discussions of clinical cases along with reviews of audio or video recordings of sessions, the material presented and processed is often focused on clinical concepts. The integration of multicultural and ethical considerations often enters the supervision process as well.

If an LPC-S of a PLPC has multiple roles as the site administrative supervisor and/or licensed mental health professional on site for clinical consultation, then the LPC-S is

informed of the PLPC's daily work functions and behaviors. However, an LPC-S who only serves as the licensing supervisor and meets with the PLPC once a week for an hour, may not have a clear picture of what the PLPC does at work or their professional behaviors at work. Therefore, LPC-Ss are not necessarily exposed to or informed of the regular day-to-day activities (administrative, interactive, etc.) that occur at PLPCs' workplaces when only serving as a licensing supervisor. Additionally, the Documentation of experience form (LA LPC Board of Examiners, 2014), section III includes an Areas of Evaluation section where the LPC-S of the PLPC is required to evaluate the PLPC on nine different skills, which include: "Ability to develop therapeutic alliance with clients" and "Exhibits qualities of the professional self" (p. 3). The two previously identified skills would be difficult to fully evaluate without feedback/information from the on-site administrative supervisor, which could be the licensed mental health professional on staff. Therefore, regular communication between the LPC-S and the on-site administrative (possibly licensed) supervisor is warranted for appropriate insight and gatekeeping responsibilities of LPC-Ss.

Case Study

The following case study/scenario will be used as example to highlight the importance of communication between an LPC-S and the administrative (licensed and/or unlicensed) site supervisors.

Greg is a registered PLPC working at a community agency providing counseling services to adults. He is being supervised by Richard, LPC-S on a weekly basis as Greg provides between 15-20 hours of direct client services per week. Greg's site supervisor, Ken is an LCSW. After four months of working at the community agency, Greg notifies

Richard that he is changing jobs and that he will be working with a state agency. Richard and Greg fill out the necessary paperwork with the LPC Board of Examiners to register the new site. Richard has never met or spoken to Ken and unbeknownst to Richard, Greg was fired from the community agency for having an inappropriate relationship with one of the clients.

In the case of Greg, PLPC, Richard, LPC-S has an ethical responsibility to address the inappropriate relationship with Greg and possibly report any unethical conduct committed by Greg (ACA, 2014, Codes I.2.a and I.2.b); however, the lack of communication between Richard and Ken, LCSW has resulted with the public potentially being in danger of being harmed through unethical counseling practices.

Discussion and Recommendations

The case of Greg illustrates how communication between the LPC-S and the administrative supervisor (licensed mental health professional – LPC, LMFT, LCSW, etc. and/or unlicensed supervisor) at the site would help the LPC-S find out more about the day-to-day activities of the PLPC and identify any areas of growth.

Additionally, although the LPC-S and PLPC rules and statutes (§803.A Supervised Experience of Provisional Licensed Professional Counselors) identify that the administrative supervisor is responsible for the PLPC, such administrators may not be familiar with the PLPC rules or the ACA code of ethics or professional conduct expected of PLPCs. Even if the licensed mental health professional on staff is the administrative supervisor, not all licensed mental health professionals (LMFT, LCSW, etc.) may be familiar with the ACA code of ethics or with the PLPC rules. Lastly, neither the administrative supervisor or the licensed mental health professional at

the setting have to sign any documents to acknowledge the responsibility as set forth by the statutes where it states, "The control, oversight, and professional responsibility for provisional licensed professional counselors rests with the provisional licensed professional counselor's administrative supervisor in the setting in which they are employed or contracted or are rendering counseling services on a volunteer basis" (§803.A.3 Supervised Experience of Provisional Licensed Professional Counselors).

Given the lack of clarity for administrative supervisors and the potential of different ethical responsibilities for different mental health professions (LPCs compared to LMFTs or LCSWs), PLPCs who demonstrate problematic or unethical behaviors may slip by without necessary intervention or remediation and potentially threaten the welfare of future clients. Therefore, LPC-Ss are encouraged to include specific language in the supervision agreement/statement of supervision practice that identifies the communication with administrative supervisors (both licensed and unlicensed) of PLPCs to ensure adequate, clear, and necessary information regarding the PLPCs' behaviors at their work setting.

Regularly scheduled communication between the LPC-S and administrative supervisor(s) every quarter (3 months) will provide the LPC-S with the necessary information needed not only for potential remediation but also for updates to quarterly evaluation (if desired) and areas of growth to be processed during future supervision sessions. Referring back to the case of Greg, PLPC: If Richard had a clause in the supervision agreement/statement of supervision practice explaining the open communication with Ken, he would have called Ken after hearing

about the job change to get some feedback regarding Greg's clinical skills and any area of growth or concern. Through such dialogue, Richard would have found out about Greg's inappropriate relationship and would have been able to address such ethical concerns. Lastly, Richard would benefit from the information provided by Ken regarding Greg's counseling skills that fall into the evaluation component of the LPC documentation of experience form.

Conclusion

All LPCs and LPC-Ss in Louisiana are required to adhere to the ACA code of ethics (2014). Included in the ACA code of ethics (2014) are guidelines for the responsibility of gatekeeping procedure of counseling supervisors. In Louisiana, LPC-Ss who solely serve as licensing supervisors do not automatically get necessary professional practice and day-to-day behavioral reports of PLPCs under their supervision. The lack of information for supervision only LPC-Ss can result in gateslipping of PLPCs with problems of professional competence or unethical behaviors resulting in the potential endangerment of the welfare of current or future clients. Therefore, LPC-Ss can include clearly communicated and documented procedures in the supervision agreement/statement of supervision practice addressing communications with licensed and unlicensed on-site supervisors of PLPCs to ensure adequate and appropriate evaluation and gatekeeping practices within the counseling profession.

References

- American Counseling Association (2014). ACA Code of ethics. Alexandria, VA: Author.
- Louisiana Licensed Professional Board of Examiners. (2014). Documentation of experience

- form. Retrieved from
<http://www.lpcboard.org/CI%20DOE%20Revised%20March%202014.pdf>
- Louisiana Professional and Occupational Standards, Title 46, Part LX, Subpart 1. Licensed Professional Counselors, Chapter 6, §603. Provisional Licensed Professional Counselors Licensing Requirement.
- Louisiana Professional and Occupational Standards, Title 46, Part LX, Subpart 1. Licensed Professional Counselors, Chapter 8, §803. Supervised Experience of Provisional Licensed Professional Counselors.
- Foster, V. A., & McAdams, C. R. (2009). Transparency for professional performance assessment: Fostering student investment in gatekeeping. *Counselor Education and Supervision, 48*, 271-284.
- Gaubatz, M. D., & Vera, E. M. (2006). Trainee competence in master's-level counseling program: A comparison of counselor educators and students' views. *Counselor Education and Supervision, 41*, 294-305.
- Kress, V. E. & Protivnak, J. J. (2009). Professional development plans to remedy problematic counseling student behaviors. *Counselor Education and Supervision, 48*, 154-166.
- Rusk, J. P., Raskin, J. D., & Hill, M. S. (2013). Problems of professional competence among counselor trainees: Programmatic issues and guidelines. *Counselor Education and Supervision, 52*, 30-42. doi:10.1002/j.1556-6978.2013.00026.x