Spring 5-18-2012

Counselor Educators' Perceptions of Working with Students Who are Unwilling to Set Aside Their Religious Beliefs When Counseling Clients: A Qualitative Study

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Counselor Educators' Perceptions of Working with Students Who are Unwilling to Set Aside Their
Religious Beliefs When Counseling Clients: A Qualitative Study

A Dissertation

Submitted to the Graduate Faculty of the
University of New Orleans
in partial fulfillment of the
requirements for the degree of

Doctor of Philosophy
in
Counselor Education

by

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May 2012

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DEDICATION

I would like to dedicate this dissertation to my parents, Bill and Mary Saussaye who instilled in me a love of education and always encouraged me to follow my own path even when none of us understood where it was going.

ACKNOWLEDGEMENT

I would like to acknowledge my dissertation committee, Dr. Barbara Herlihy – chair, Dr.

Roxane Dufrene - methodologist, and Dr. Zarus Watson.

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Abstract

The purpose of this qualitative study was to explore counselor educators' perceptions of working with students unwilling to set aside their personal religious beliefs while counseling clients. Purposeful sampling was used in a snowball fashion to select participants with a minimum of one year experience as a counselor educator and who are currently working in the field of counselor education.

The participants of this study reported and described perceptions of their lived experiences as counselor educators. The primary research question for my study was what are the perceptions of counselor educators as they relate to working with students who are unwilling to set aside their religious beliefs while counseling clients? The foundation for my study was provided by a review of counselor education literature which focused on areas such as gate-keeping, values conflicts, remediation, referrals, due process, and student dismissal. In this study, the *Ward v. Wilbanks et al.* and *Keeton v. Anderson-Wiley et al*. legal cases provided the context within which the question of how counselor educators handle working with students who are unwilling to set aside their religious beliefs was explored. Semi-structured phenomenological interviews including the use of open-ended questions were used to collect data. Taped interviews were transcribed, read and analyzed for key words and descriptive terms. The data was coded into categories, categories were clustered into themes and themes were cross-analyzed to create super-ordinate themes. Super-ordinate themes were then used to address the primary and secondary research questions.

Based on the results of my study the one over-arching theme that appeared was gate-keeping. Under the realm of gate-keeping fell three super-ordinate themes: ethical issues, student

interventions, and legal issues. Implications for counselor educators are presented along with

recommendations for further research. Personal reflections of the researcher were presented.

CHAPTER ONE

Introduction

In this chapter, the background is presented of the study on counselor educators'
perceptions as they relate to working with students who are unwilling to set aside their religious
beliefs when counseling clients. A statement of the problem is presented, the significance of the
study is explained, research questions are presented and an overview of methodology is offered.
Assumptions of the study are presented, as are potential limitations and delimitations. Definitions
of terms are provided and the organization of the document is presented.

Background

Recent legal cases have demonstrated that some counseling students have difficulty
setting aside their own religious beliefs when working with clients. Two cases, in particular,
have sparked discussion in the counselor education community. In this study, the *Ward v.
Wilbanks et al.* and *Keeton v. Anderson-Wiley et al*. cases provide the context within which the
question of how counselor educators handle working with students who are unwilling to set aside
their religious beliefs will be explored. In each case, *Ward v. Wilbanks et al.* which involved
counseling faculty and a student at Eastern Michigan University and *Keeton v. Anderson-Wiley
et al.* which originated at Augusta State University in Georgia, a student was dismissed after
refusing to work with a homosexual client based upon the student's religious beliefs that same
sex relationships were immoral. In both cases, the students were offered the opportunity for
remediation and they declined. Both students claimed that they were discriminated against
because of their religious beliefs. In both cases, the court granted summary judgment to the
faculty defendants who had dismissed these counselor trainees from their programs, ultimately

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finding that the termination of students was based on their inability to follow ethical standards and not because they were discriminated against on the basis of their own religious beliefs.

        The rulings in *Ward v. Wilbanks et al.* and *Keeton v. Anderson-Wiley et al.* have significant implications for counselor educators as they strive to fulfill their teaching and training responsibilities. Counselor educators have a legal and an ethical obligation to respect students' freedom to espouse their religious values, while at the same time they must teach students to set aside these values when they enter into a counseling relationship. At times in the training process counselor educators and supervisors may need to invoke their role as gate-keepers and provide remediation to assist students struggling to set aside their own values. In some cases, if remediation fails or is refused, then dismissing a student from the training program becomes necessary. As gate-keepers to the profession, counselor educators have an ethical responsibility to ensure that students are not allowed to work with clients when the educators believe the students are unable or unwilling to provide competent, ethical treatment or that they might potentially harm the client. Counseling programs that are accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP) serve as gate-keepers that help to ensure that counselors in training are performing at an appropriate level of ethical competency (2009, Section I.L). Gate-keeping, as required by the ACA *Code of Ethics* and CACREP, ensures that students are informed of expectations, provides ongoing assessment, and includes remediation and student dismissal when remediation is unsuccessful.

        Counselor educators have an ethical obligation to make students aware of the ethical standards of the counseling profession (ACA, 2005, F.6.d.). One such standard cautions counselors to avoid imposing their own values on their clients (ACA, 2005, A.4.b.). Counselor

educators recognize that a core ethical issue in counseling is the degree to which a counselor's values should enter into the therapeutic relationship and they address this issue with their students during the training process. The *ACA Code of Ethics* clearly states that counselors are expected to "understand the diverse cultural backgrounds of the clients they serve" and to "explore their own cultural identities and how these affect their values and beliefs about the counseling process" (ACA, 2005, Introduction). Counselors are instructed to be "…aware of their own values, attitudes, beliefs, and behaviors" and are encouraged to "avoid imposing values that are inconsistent with counseling goals" as they "respect the diversity of clients" (ACA, 2005, A.4.b.). Furthermore, counselors must not "condone or engage in discrimination based on age, culture, disability, ethnicity, race, religion/spirituality, gender, gender identity, sexual orientation, marital status/ partnership, language preference, socioeconomic status, or any basis proscribed by law" (ACA, 2005,C.5.).

Counselor educators and supervisors recognize the likelihood that most counselors, throughout the course of their practice, will be faced with ethical issues involving differences between their values and those of a client, and that when this happens there are appropriate ways to deal with such clashes. Because some religions teach that homosexuality is a sin, occasionally counselors who practice those religions may have difficulty working with clients who are lesbian, gay, bisexual, or transsexual (LGBT). Counselors with certain religious beliefs may also have value conflicts with clients relating to issues such as abortion, pre-marital and extramarital sex, assisted suicide, and inter-racial relationships.

An issue that is emerging in response to the *Ward v. Wilbanks et al*. and *Keeton vs. Anderson-Wiley et al*. lawsuits is whether it is ethical to refer a client when there is a serious

value clash between the counselor and the client. The counseling literature appears to be somewhat contradictory in addressing this issue. Literature suggests that referral may be a viable option when there are value clashes between a counselor and a client, but not when a counselor is unwilling to look at his or her part in the conflict (Corey, Corey & Callanan, 2011). A counselor cannot simply keep referring all clients who present with the same problematic issue. If counselors recognize a pattern of frequent referrals, they might want to examine their reasons for doing so (Corey & Corey, 2007). In cases where professional experience is limited, such as while working in a practicum or internship setting, it is a vital part of one's professional development to be open to consultation with other professionals in an effort to upgrade one's skills (Corey & Corey, 2007).

The more specific issue of referral as an option in cases of conflicts between a counselor's religious beliefs and a client's sexual orientation is beginning to be addressed in the literature. Recent literature by Granello and Young (2012) stressed that referring GLBT clients to another counselor because of a counselor's religious values "…is not sanctioned by the counseling profession and has practical as well as legal and ethical implications" (p.391) and that it is illegal to refuse to work with any clients based on their sexual orientation because it is discriminatory.

Statement of the Problem

The act of student dismissal brings with it a number of key issues facing counselor educators and supervisors. Throughout all levels of counselor training, quality control checks and standards are set in place to ensure that students are not only demonstrating proficient skill acquisition, but also to ensure that they are practicing within the realm of ethical guidelines. At the structural level, the Council for Accreditation of Counseling and Related Educational

Programs Accreditation Standards (CACREP, 2009) are in place. At the individual level, the American Counseling Association's *Code of Ethics* (ACA, 2005) contains the standards to which anyone in the counseling field, including counseling students, must adhere. Ethical mandates (ACA, 2005) and accreditation standards (CACREP, 2009) require counselor educators and supervisors to remediate and dismiss students when necessary. In cases where students are ultimately dismissed from their programs of study due to their unwillingness to set aside their religious beliefs when counseling clients, a number of issues arise. In cases where remediation fails, students must be given due process. Cases which involve religious issues bring with them an added layer of complexity because, in some cases, students might bring litigation against their universities claiming that they, themselves, have been victims of discrimination. Ultimately though, in the two recent court cases, termination of students was based on their inability to follow ethical standards and not because they were discriminated against on the basis of their own religious beliefs.

Significance of the Study

A review of the literature indicated that there was a general lack of research on how counselor educators handle working with students who are unwilling to set aside their religious beliefs during counseling sessions with clients. Through qualitative analysis, this study provided insight into such perceptions. A more complete understanding of how counselor educators' deal with students who refuse to set aside their personal religious beliefs when counseling clients can lead to more effective means of addressing these types of situations in academic settings and may improve gate-keeping and remediation strategies for students who fail to meet the basic criteria of their programs.

Research Questions

The primary research question being investigated is: What are the perceptions of counselor educators as they relate to working with students who are unwilling to set aside their religious beliefs while counseling clients? Specific research questions are:

1. According to counselor educators, how does being a gate-keeper affect their decision making process when working with students who are unwilling to set aside their religious beliefs while counseling clients?

2. What do counselor educators perceive to be the primary client issues that are involved when students are unwilling to set aside their religious beliefs while counseling clients?

3. According to counselor educators, what ethical issues must be considered when working with students who are unwilling to set aside their religious beliefs while counseling clients?

4. According to counselor educators, at which point or points in a counseling student's training (i.e., during admission standards, within the curriculum, or during the supervision process) should problematic areas be addressed? How should these areas be addressed?

5. According to counselor educators, what legal issues must be considered when working with students who are unwilling to set aside their religious beliefs while counseling clients?

6. How does the fear of legal actions affect counselor educators' decision making process when working with students who refuse to set aside their religious beliefs?

Overview of Methodology

This research study utilized qualitative methodological techniques to obtain insight into the perceptions of counselor educators as they relate to working with students who are unwilling to set aside their religious beliefs when working with clients. Qualitative methodology allows the researcher to see the world from another's perspective, therefore allowing him or her to make discoveries that will contribute to the development of empirical knowledge. Personal interviews with participants provide rich descriptive data. Through personal interviews with counselor educators in the field, I collected data representative of their perceptions. Qualitative methodology was selected for this research study because it seeks to understand human behavior through studying lived experiences. More specifically, I utilized an Interpretive Phenomenological Analysis (IPA) approach to explore the perceptions of counselor educators as they relate to working with students who are unwilling to set aside their religious beliefs when counseling clients. This approach was chosen because IPA usually involves a small number of cases, is inductive, and seeks out an exploratory stance towards participants, allowing for greater depth of insight. IPA is a suitable approach when one is trying to find out how individuals are perceiving the particular situations they are facing and how they are making sense of their personal and social worlds. Based on the idea that phenomenology is used to study how human beings come to understand the world through the interpretation of their experiences, IPA is an appropriate qualitative approach for this research study.

To ensure that all respondents were posed the same questions during interviews, a semi-structured interview protocol was created and implemented. For participants who chose to participate via Skype or telephone, the same protocol questions were posed, and follow-up member checks were employed to ensure that all responses had been accurately represented.

Assumptions

It was my primary assumption that research participants would openly share their own personal experiences, insights, beliefs and perceptions regarding working with students who are unwilling to set aside their religious beliefs during counseling sessions with clients. My second assumption was that each participant would be able to offer insight that was unique to his or her own personal experience as it relates to the topic being studied. Additionally, I assumed that the answers provided by each research participant were beneficial in the development of themes that would ultimately help qualify the underlying findings of my study. Furthermore, I assumed that all participants provided answers that were rich and descriptive, allowing me to accurately capture their perceptions. Another basic assumption of this research is that the interview questions designed for the study were valid and accurately assessed counselor educators' perceptions of working with students who are unwilling to set aside their religious beliefs when counseling clients.

Limitations and Delimitations

The first potential limitation of this study was participant bias. Because participants selected for this study are counselor educators, responses may be biased in ways that were reactive to the recent litigation. The second limitation of this study was the possibility of researcher bias, as the researcher has his own views on the how issues should be addressed. These biases were bracketed and are addressed in Chapter 3. A third limitation was that the findings will have limited generalizability; however, generalizability is not a goal of qualitative research.

A delimitation of this study is that it was exploring counselor educators' experiences of working with students whose religious beliefs clash with those of the client, and no other types of value clashes. This research study, however, evolved from my interest in the two legal cases involving the dismissal of students who brought suit due to feelings of religious discrimination. A second delimitation of this qualitative study related to the fact that it is exploring the lived experiences of a small number of participants. Although with IPA, data are gathered to the point of saturation, there is the possibility that a larger pool of participants could lead to an even deeper understanding of the phenomena being studied.

Definition of Terms

Due Process: A key legal principle that impacts policies and procedures related to student dismissals. Due process means that decisions to dismiss students must not be arbitrary or capricious and students must be afforded the means to appeal the decision (Forrest et al., 1999; Gilfoyle, 2008; Kerl et al., 2002; Knoff & Prout, 1985; Lumadue & Duffey, 1999; McAdams & Foster, 2007; Wayne, 2004).

Gate-keeping: The term 'gate-keeping' refers to restricting access to a desired objective, such as a counselor educator screening students for satisfactory completion of program requirements for a counselor education graduate degree.

Keeton v. Anderson-Wiley, et al.: Legal case that originated at Augusta State University in Georgia when a student brought suit against her counseling program claiming that she was discriminated against based upon her religious beliefs after she was terminated from the program for refusing to counsel a client on a same sex relationship.

Religious Values: The basic beliefs of various spiritual systems, major world religions, agnosticism, and atheism.

Referral: The sending of a client to another counselor for ongoing treatment.

*Student Dismissal***:** An official decision by a counseling graduate program to end a student's enrollment in the program, such as a suspension, mandatory leave of absence, or expulsion.

*Student Remediation***:** A documented, procedural process that addresses observed deficiencies in student performance with the intent to provide students with specific means to remedy their inabilities (Dufrene & Henderson, 2009).

Value Conflict: Conflict that results from a clash between differing world-views that occurs when one individual's assumptions about the best way to live may differ radically from the values held by another individual.

Ward v. Wilbanks, et al.: Legal case involving the counseling faculty and a student at Eastern Michigan University in which the student refused to counsel her client on same-sex relationship issues. The student claimed that she was discriminated against following her termination but the court found in favor of the faculty, basing their decision on the fact that the student failed to adhere to the ethical standards of her profession.

Organization of Document

This dissertation is divided into five distinct and separate chapters each with its own purpose. Chapter One offers an overview of the study, it defines the purpose of the study, presents the research questions, addresses the methodology implemented and describes the overall organization of the document. Chapter Two contains the supportive literature used to base the study upon and guide the study during the exploration and collection of research data. It

is in Chapter Two that the legal and ethical implications of counseling are addressed along with an overview of recent litigation, and an explanation of the role of values in the counseling relationship is provided. The issues relating to value conflicts are explored as are the issues involved in the referral of clients based upon value conflicts. Chapter Three includes a thorough explanation of the methodology utilized in the data collection and analysis as well as a detailed account of the rationale for choosing specific method. Chapter Four contains the findings from the research. In this section, summaries of the interviews were provided; emerging themes and super-ordinate are presented as well as personal reflections of the researcher. Finally, Chapter Five includes a discussion of the findings according to the super-ordinate themes discovered, as well as a summary of the study, limitations of the study, and implications for future research. References and the appendices are listed in the final pages of the dissertation.

CHAPTER TWO

Review of the Literature

In this chapter, a review is provided of literature that is relevant and related to the research question of how counselor educators deal with students who are unwilling to set aside their religious beliefs while counseling clients. This question has captured the attention of counselor educators as a result of two recent lawsuits in which students brought suit against the faculty who dismissed them from their master's degree programs in counseling. In each case, *Ward v. Wilbanks et al.* which involved counseling faculty and a student at Eastern Michigan University (EMU) and *Keeton v. Anderson-Wiley et al.* which originated at Augusta State University (ASU) in Georgia, the student was dismissed after she refused to work with a homosexual client based upon her own religious beliefs that same sex relationships were immoral. Both Ward and Keeton were offered the opportunity for remediation, which they declined. In both cases, the court granted summary judgment to the faculty defendants who had dismissed these counselor trainees from their programs.

This chapter begins with a description of two recent legal cases involving the dismissal of counseling students from their respective programs. The *Ward v. Wilbanks et al.* and *Keeton v. Anderson-Wiley et al.* cases are discussed along with the issues related to the cases. The literature regarding gate-keeping, including student remediation and dismissal, is discussed. Value conflicts in counselor education and supervision are explored along with possible ways that such conflicts can be resolved. The topic of client referral is addressed along with the ethical and legal components of referring clients based on value conflicts. Finally, reactions of counselor educators to the two recent legal cases are explored.

<center>**Recent Lawsuits**</center>

This section provides an overview of the *Ward Vs. Wilbanks et al* and *Keeton Vs. Anderson-Wiley*, *et al* cases. Both cases have wide-ranging implications for counselor educators as they strive to fulfill their teaching and training responsibilities. Furthermore, the cases provide the context within which the question of how counselor educators handle working with students who are unwilling to set aside their religious beliefs is explored.

Ward vs. Wilbanks et al. (Eastern Michigan University)

In 2006, Julea Ward was admitted to the Eastern Michigan University (EMU) master's degree program in counseling. As outlined by the university's student handbook, all students were required to know and abide by the American Counseling Association (ACA) *Code of Ethics* as well as the American School Counselor Association (ASCA*) Ethical Standards for School Counselors* so that the counseling program could maintain its accreditation through the Council for Accreditation of Counseling and Related Educational Programs (CACREP).

 Ward, the plaintiff in this case, acknowledged that her belief based on Orthodox Christian teachings was that homosexuality was morally wrong. In 2009, Ward enrolled in a practicum during which time she was assigned to counsel a client who had been counseled previously on issues relating to his homosexual relationship. Ward requested of her supervisor, Dr. Callaway, that she be allowed to refer the client to another counselor due to her inability to affirm the client's homosexual behavior. Dr. Callaway chose to cancel the client's appointment and reschedule it with a different counselor, so as to not harm the client. Following this decision, Dr. Callaway informed Ward that she would not be assigned any further clients and that she

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would be required to undergo an informal review because she had violated University and ACA policies. The review committee, comprised of the Ward's advisor, Professor Dugger, and Dr. Callaway, determined that Ward had engaged in "unethical, threatening, or unprofessional conduct," an "inability to tolerate different points of view," "imposing values that are inconsistent with counseling goals," and "discrimination based on . . . sexual orientation" (*Ward v. Wilbanks et al., 2010,* p. 2).

The EMU faculty asserted that the informal review was held to discuss their concern about the student's inability to counsel clients based on the client's value system rather than on the counselor's value system. The student acknowledged that she believed that counseling homosexual clients violated her religious beliefs. The EMU counseling program, in accordance with the ethical standards of the counseling profession, requires that while in practicum students demonstrate the ability to set aside their personal values or beliefs systems and work with the value system of the client (*Ward v. Wilbanks et al.,* 2010). Thus the faculty believed that Ward, by demonstrating that she was unwilling to counsel a client based upon the client's sexual orientation, violated this ethical standard.

Following her informal review, the plaintiff was given the options of: (1) completing a remediation program as directed; (2) voluntarily leaving the counseling program; or (3) requesting a formal hearing. The plaintiff declined the opportunity for remediation and instead opted for a formal hearing. The formal hearing was attended by Professors Callaway and Dugger, three additional professors, and a student representative. During the formal review, Ward explained that although she had a problem with counseling clients on their homosexual relationships, she would not object to counseling them on other issues not pertaining to their

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same-sex relationships. Ward refused to support any behavior that went against what the Bible says (*Ward v. Wilbanks et al., 2010).*

By a unanimous decision, the review board concluded that Ward should be dismissed from the program based upon failure to comply with the *ACA Code of Ethics* (2005) which states that a counselor's primary responsibility "is to respect the dignity and to promote the welfare of clients" (Standard A.1.a) and that "…counselors are aware of their own values, attitudes, beliefs, and behaviors and avoid imposing values that are inconsistent with counseling goals" (Standard A.1.a). Furthermore, Ward had violated ethical standards related to respect for diversity (ACA, 2005, Introduction) and non-discrimination based on … sexual orientation…" (ACA, 2005, Standard C.5).

Ward claimed that her dismissal was because of religious beliefs regarding homosexuality. She insisted that she had violated no ethical codes, that she was wrongfully dismissed from the program, and that the defendants required her to violate her religious beliefs. Ward claimed that her rights under the Equal Protection Clause of the Fourteenth Amendment were violated (*Ward v. Wilbanks et al., 2010).* The court found that the faculty's decisions did not constitute a constitutional violation. Therefore, the plaintiff's Equal Protection Clause claim was without merit. Furthermore, according to the court, EMU had an interest in designing and maintaining a counseling program that adhered to CACREP accreditation standards (*Ward v. Wilbanks et al., 2010).* The court found it pedagogically appropriate for a program to base its curriculum on the ACA *Code of Ethics.* On January 27th 2012, The Sixth Circuit Court of Appeals sent the case back to district court for a jury trial. Currently, no legal findings have been

made against the school, nor has the court ruled that the university engaged in any

discrimination.

Keeton vs. Anderson-Wiley et al. (Augusta State University)

In the fall of 2009 the Plaintiff, Jennifer Keeton, enrolled in Augusta State University's

counselor education master's degree program with the goal of becoming a school counselor. As

part of the counseling curriculum students at ASU are expected to abide by the ACA *Code of*

Ethics. As a Christian, Keeton expressed her religious-based, personal views on the morality of

homosexual conduct in classroom discussions, in school papers, in conversations with her

professors, and outside the classroom with fellow students. Keeton stated that she condemns

homosexuality based upon Biblical teaching and that she believes sexual behavior is the result of

personal choice (*Keeton v. Anderson-Wiley et al., 2010*).

The counseling faculty determined that if Keeton were unable to separate her personal,

religious-based views on sexual morality from her professional counseling duties, she would be

in violation of the ACA's *Code of Ethics*. The faculty also concluded that some of the Plaintiff's

views on sexual behavior were not consistent with psychological research (*Keeton v. Anderson-*

Wiley et al., 2010). The faculty had received reports from a fellow student in the counseling

program that Keeton had shared her interest in conversion therapy for homosexual clients. The

faculty noted that research in psychological peer-reviewed journals revealed that conversion

therapy was ineffective in changing an individual's sexual orientation (*Keeton v. Anderson-Wiley*

et al., 2010).

Consistent with the counseling program's official policy, Keeton was placed on

remediation status by the program's faculty and was informed that she must comply with the

terms of a remediation plan. Faculty member Dr. Anderson-Wiley informed Keeton that if she

were unable to complete the remediation plan to the faculty's satisfaction, she would be

dismissed from the counseling program (*Keeton v. Anderson-Wiley et al., 2010*).

Keeton's remediation plan required her to attend workshops emphasizing diversity

sensitivity training towards working with LGBT populations and read journal articles on

improving counselor effectiveness when working with LGBT clients. She was also required to

increase her exposure and interaction with gay populations, familiarize herself with

competencies for counseling homosexual clients, and submit reflection papers on what she was

learning (*Keeton v. Anderson-Wiley et al., 2010*).

Keeton chose not to participate in the remediation plan, stating that she could not

successfully complete it given her personally-held convictions on sexual morality. Keeton then

brought suit, alleging that her First Amendment rights to freedom of speech and free exercise of

religion had been violated, as well as her Fourteenth Amendment right to due process (*Keeton v.

Anderson-Wiley et al., 2010*).

ASU faculty testified that the remediation plan was crafted for Keeton, not as retaliation

for voicing her personal beliefs, but only because the faculty questioned her ability to perform as

a counselor in a professionally ethical manner, as required by the counseling program's

curriculum. The court cited the *Ward v. Wilbanks* (E.D. Mich. July 26, 2010) case as being the

most similar to the Keeton case. In the EMU case, the District Court held that counseling

students must follow the *ACA Code of Ethics* (2005) regardless of the student's religion. The

Keeton court determined that because of Keeton's inability to resist imposing her moral

viewpoint on clients she was in violation of the ACA *Code of Ethics* and the ASU counseling

program's curriculum (*Keeton v. Anderson-Wiley et al., 2010*). Furthermore, it was determined that Keeton's refusal to participate in the remediation plan demonstrated her unwillingness to complete curricular requirements.

The court also determined that the ASU counseling program had a legitimate pedagogical interest in maintaining accreditation with CACREP, as well as in producing counselors with an ability to counsel diverse populations, consistent with the ethical standards adopted by the program (*Keeton v. Anderson-Wiley et al., 2010*). It was determined that the Plaintiff's refusal to complete the remediation plan and her unwillingness to adhere to the *ACA Code of Ethics* constituted a refusal to complete curriculum requirements. Ultimately the court ruled that, because the Plaintiff could not clearly establish a substantial likelihood of success on the merits of her lawsuit, her motion for preliminary injunction was denied (*Keeton v. Anderson-Wiley et al., 2010*).

Implications of the Cases for Counselor Educators

The rulings in *Ward v. Wilbanks et al.* and *Keeton v. Anderson-Wiley et al.* have significant implications for counselor educators as they strive to fulfill their teaching and training responsibilities. Counselor educators have a legal and an ethical obligation to respect students' freedom to espouse their religious values, while at the same time they must teach students to set aside these values when they enter into a counseling relationship (ACA, 2005, A.4.b.). Additionally, counselor educators must ensure that students develop multicultural counseling competence, including competence in working with LGBT clients in schools and other settings (ACA, 2005, F.6.b.). These two cases have presented counselor educators with the opportunity to explore and address how they work with students who are unwilling to set aside their personal

religious beliefs when counseling clients. When this situation arises, counselor educators and

supervisors may need to invoke their role as gate-keepers, providing remediation to assist these

students and dismissing them from the training programs if remediation fails or is refused. In the

next section, issues relating to the gate-keeping process, including remediation and dismissal, are

discussed.

Gate-keeping

As gate-keepers to the profession, counselor educators have an ethical responsibility to

ensure that students are not allowed to work with clients when the educators believe the students

are unable or unwilling to provide competent, ethical treatment and might potentially harm the

client. A considerable amount of literature has been generated regarding the fact that counselor

educators assume a gate-keeping role when working with students who are about to enter the

field (Baldo et al., 1997; Bemak et al., 1999; Frame & Stevens-Smith, 1995; Kerl et al., 2002;

Lamb et al., 1987, 1991; Lumadue & Duffey, 1999; McAdams et al., 2007; Wilkerson, 2006).

The literature on gatek-eeping has focused more on dismissal than on remediation. Gate-keeping

models emphasize the dismissal of students who do not meet the criteria expected by a program

based upon ethical and legal requirements. It has been recommended that faculty use an

assessment form when evaluating students (Frame & Stevens-Smith, 1995; Kerl et al., 2002;

Lamb et al., 1991; Lumadue & Duffey, 1999; McAdams et al., 2007; Wilkerson, 2006), and the

various models propose different procedures for faculty to implement when students' evaluations

indicate problematic areas. Such procedures include devising a review meeting attended by all

faculty members (Frame & Stevens-Smith, 1995) or by a committee of three faculty members

appointed by the chair (Kerl et al., 2002). In some cases, termination or dismissal of the student has been recommended when the student was unable to be successfully remediated.

Whereas standards set forth in the *ACA Code of Ethics* (2005) specify ethical practices as they relate to each individual in the counseling field, accountability for competent training is reinforced at the university level through accreditation standards. Some counseling programs are accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP). According to CACREP standards, universities serve as gate-keeping institutions that help to ensure that counselors in training are performing at an appropriate level of ethical competency (2009, Section I.L). Gate-keeping begins during the screening and application process and continues throughout the entire professional development process. At the beginning of the first term of enrollment all new students are provided with an explanation of the procedures for student remediation and/or dismissal and academic appeal policy (2009, Section I.L.d) and the program faculty monitors each student's progress throughout the program (2009, Section I.P).   Furthermore, "Consistent with established institutional due process policy and the American Counseling Association's (ACA) *Code of Ethics* and other relevant codes of ethics and standards of practice, if evaluations indicate that a student is not appropriate for the program, faculty members help facilitate the student's transition out of the program" (2009, Section I.P.). Gate-keeping, as required by the ACA *Code of Ethics* and CACREP, ensures that students are informed of expectations, provides ongoing assessment, and includes remediation and student dismissal when remediation is unsuccessful.

Remediation

When counseling students are unable to demonstrate a competent understanding of the curriculum being taught, the *ACA Code of Ethics* (2005) stresses that counselor educators must "assist students in securing remedial assistance when needed, seek professional consultation and document their decision to dismiss or refer students for assistance, and ensure that students have recourse in a timely manner to address decisions to require them to seek assistance or to dismiss them and provide students with due process according to institutional policies and procedures" (F.9.b.). While the ACA Code of Ethics does present the idea of remediation, counselor educators are struggling with the fact that there no clear procedures have yet to be developed. Dufrene and Henderson (2009) explained, "Remediation is a fairly new process in supervision, with few documented resources for procedures and techniques that address both the supervisors' and the trainee's concerns" (p.156).

Counselor supervisors, like counselor educators, serve as gate-keepers; it is their responsibility to ensure that counseling students who do not demonstrate adequate knowledge, skills, or ethical behavior are not allowed into the field. During the supervision process, the supervisor, "through ongoing evaluation and appraisal" is required to maintain an awareness of "the limitations of supervisees that might impede performance" (ACA, 2005, F.5.b.). When supervisors find that their supervisees are unable to provide competent services to their clients, they "recommend dismissal from training programs, applied counseling settings, or state or voluntary professional credentialing processes" (ACA, 2005, F.5.b.).

Henderson (2009) found that the five behaviors most often requiring remediation were: (1) receptivity to feedback; (2) basic counseling skills; (3) boundaries with clients, colleagues,

and/or supervisors; (4) openness to self-examination; and (5) advanced counseling skills. She

determined that increased supervision was rated the most effective intervention. In both legal

cases previously discussed, the students (Ward and Keeton) did, indeed, demonstrate their need

for remediation based upon their lack of receptivity to feedback and their lack of openness to

self-examination.

Dismissal and Due Process

The main legal issue that needs to be addressed when considering student dismissal from

a specific program is due process. Due process is a right protected in the fourteenth Amendment

of the U.S. Constitution (Cobb,1994; Knoff & Prout, 1985; Wayne, 2004). Denial of due process

can be charged against institutions which receive federal or state funding (Gilfoyle, 2008). It can

be claimed that previously admitted students have been denied the protected right to continue

their enrollment (Frame & Stevens-Smith, 1995; Kerl et al., 2002).

Due process involves substantive due process and procedural due process. Substantive

due process relates to depriving someone of their rights. For example, if enrollment is denied, the

reasons must be legitimate and not arbitrary or capricious (Forrest et al., 1999; Gilfoyle, 2008;

Kerl et al., 2002; Knoff & Prout, 1985; McAdams & Foster, 2007; Wayne, 2004). Procedural

due process entails the actual steps taken to deprive someone of their rights.

Legal precedent for dismissal from clinical training programs has been demonstrated in

law suits involving medical students (Frame & Stevens-Smith, 1995; Knoff & Prout,1985).

Gilfoyle (2008) explained that courts grant faculty "substantial leeway" in academic decisions

regarding student evaluations and dismissals (p. 202). The court's endorsement of faculty

expertise in academic decision making is considered to negate the need for a hearing to

determine specific factual information that would be required in disciplinary dismissals (Frame & Stevens-Smith, 1995; Knoff & Prout, 1985; Wayne, 2004**).** Whenever individuals are notified of the decision to be deprived of a right, such as the right to continue as a student in a counseling program, they are granted the opportunity to respond to the decision and are given the means to appeal the decision (Forrest et al.,1999; Kerl et al., 2002; Lumadue & Duffey, 1999; McAdams & Foster, 2007).

In recent years, the issue of due process has been brought into the field of counselor education as counseling students have attempted to challenge their dismissals from their programs, and these challenges have been addressed in the literature (Gilfoyle, 2008; Olkin & Gaughen, 1991). When a counseling student demonstrates an inability or refusal to follow recommended remediation, a university has a right to terminate that student's enrollment. Although *Ward v. Wilbanks et al.* and *Keeton v. Anderson Wiley et al.* are the most recent cases involving counselor education and student dismissal, the *Plaintiff v. Rector and Board of Visitors of The College of William and Mary* (2005) case provides a context in which a number of important issues facing counselor educators began to emerge.

In April 2001, The College of William and Mary admitted Victoria Butler to the counseling program and in 2002 Butler enrolled in the practicum course. It was made clear to Butler that her site was only a prevention site, and that no videotaping would be permitted there. However, it was discovered that Butler inappropriately promoted herself as a counselor with professional experience as she secretly met with clients. In February of 2002, her supervisor met with her to discuss concerns about the deceit and misconduct. Butler denied the accusations and the counseling program faculty decided to remove Butler from the practicum. Butler was then

placed on a remediation plan during which time she demonstrated other unprofessional behaviors such as threatening other students and faculty. In April 2002, the program faculty met and recommended that Butler be expelled from the program. Butler was given an opportunity to discuss her situation; instead, she filed a lawsuit alleging that the university had violated her substantive and procedural due process rights by expelling her. In order to establish a substantive due process violation, Butler would have had to demonstrate that the university's actions in expelling her were arbitrary and egregious. The court ruled that Butler's claim did not meet this standard and dismissed all of Butler's claims.

The major legal cases involving counseling student dismissals from training programs based upon their violation of ethical standards raise a number of issues pertinent to the field of counselor education and how counselor educators handle working with value conflicts during the training process. Two of these cases, *Ward v. Wilbanks et al.*, and *Keeton v. Anderson-Wiley et al.*, involved issues that relate to counseling homosexual clients and the counseling student's religious beliefs, which raises the question of how counselor educators handle working with students who are unwilling to set aside their personal religious beliefs when counseling clients. Literature related to counselor education and value conflicts is discussed in more depth in the following section.

Value Conflicts in Counselor Education and Supervision

Counselor educators have an ethical obligation to make students aware of the ethical standards of the counseling profession (ACA, 2005, F.6.d.). One such standard cautions counselors to avoid imposing their own values on their clients (ACA, 2005, A.4.b.). Counselor educators recognize that a core ethical issue in counseling is the degree to which a counselor's

values should enter into the therapeutic relationship and they address this issue with their students during the training process. The *ACA Code of Ethics* states that counselors are "…aware of their own values, attitudes, beliefs, and behaviors" and that they should "avoid imposing values that are inconsistent with counseling goals" (ACA, 2005, A.4.b.). Counselor educators and supervisors have a responsibility to ensure that their students and supervisees adhere to this standard. A task for counselor educators is to help students understand that, as Corey (2008) asserted, "Counseling and therapy are not forms of indoctrination whereby practitioners persuade clients to act or feel in the right way" (p.19). Corey (2008) further explained that, although counselors are taught not to let their values show because doing so might bias the direction of therapy, we must recognize that counselors are not neutral or value-free.

Counselor educators and supervisors recognize the likelihood that most counselors, throughout the course of their practice, will be faced with ethical issues involving differences between their values and those of a client, and that when this happens there are appropriate ways to deal with such clashes. Counselor educators offer their students the opportunity to explore their own values as they relate to topics that might contribute to value conflicts between themselves and their clients. For example, counselor educators might encourage their students to call awareness to their value conflicts while at the same time familiarizing them with the legal and ethical ramifications of possible referral.

As was discussed earlier, value conflicts related to religious beliefs have been an issue in recent law suits involving counselor education programs. The Association for Spiritual, Ethical, and Religious Values in Counseling (ASERVIC) has set forth expected competencies for addressing spiritual and religious issues in counseling. Competencies include categories relating

to culture and worldview and counselor self-awareness. The competencies demonstrate how a counselor's beliefs, values, attitudes, and assumptions should work within a client's worldview. Cashwell (2010) stated, "These competencies are included first to demonstrate that self-awareness, the person of the counselor, and a championing of diversity are all cornerstones of the ASERVIC approach to integrating spirituality and religion into the counseling process." According to the most recently revised ASERVIC (2010) competencies, counselors are expected to actively explore their own attitudes, beliefs and values about religion and spirituality and continually evaluate the influence of their own beliefs in the therapeutic relationship. Religious and spiritual values influence the practice of many counselors; however, counselors must not attempt to indoctrinate clients in a particular value system (Grimm, 1994).

When counselors are unable to set aside their own religious beliefs when working with clients, they are at risk of violating ethical standards related to multicultural competence and non-discrimination. The *ACA Code of Ethics* states that counselors are expected to "understand the diverse cultural backgrounds of the clients they serve" and to "explore their own cultural identities and how these affect their values and beliefs about the counseling process" (ACA, 2005, Introduction). Counselors are instructed to be "…aware of their own values, attitudes, beliefs, and behaviors" and are encouraged to "avoid imposing values that are inconsistent with counseling goals" as they "respect the diversity of clients" (A.4.b.). Furthermore, counselors must not "condone or engage in discrimination based on age, culture, disability, ethnicity, race, religion/spirituality, gender, gender identity, sexual orientation, marital status/ partnership, language preference, socioeconomic status, or any basis proscribed by law" (C.5.).

Evidence exists that a small minority of counselors may be unable to bracket their own religious beliefs and thus may be imposing their own beliefs onto their clients. Recently, Neukrug and Milliken (2011) polled ACA members, using a 77-item survey of counselor behaviors. Of the 1,795 members contacted by email, 535 (28%) responded to the survey. Neukrug and Milliken found that 13.4% of participants believed it was ethical for counselors to change their client's values and that 0.6 % believed that it was ethical to attempt to persuade their clients to adopt the counselor's religious conviction.

Value-laden Issues

Although the lawsuits discussed early in this chapter involved students who were dismissed due to their refusal to set aside their own values as they related specifically to religious beliefs and homosexuality, a number of values issues may be related to a counselor's religious beliefs. Value conflicts related to abortion, assisted suicide, premarital and extramarital sex, and sexual orientation might be directly linked with religious beliefs. Further exploration of these values issues that may relate to religious beliefs is provided in the next sub-sections.

Abortion.

When working with a client considering abortion, a number of values must be taken into account within the therapeutic relationship, some of which might directly relate to religious ideals. Even though counselors should not impose their own values onto clients, Neukrug and Milliken (2011) found that 8.0 % of counselors polled believed that it was ethical to persuade a client to not have an abortion even when the client wanted one. Remley and Herlihy (2009) suggested that, before counselors decide whether or not to work with a woman considering abortion, they must ask themselves a number of important questions, such as "Do you believe

that abortion is ever an acceptable response to an unwanted pregnancy? If so, in what circumstances? When pregnancy is endangering the mother's life or health? When pregnancy has resulted from rape or incest? When an unmarried woman does not want to marry the father or assume the responsibilities of single parenthood?" (p. 69). It is the counselor educator's responsibility to ensure that students are given opportunities throughout the training process to examine such questions.

According to Corey and Corey (2011), value clashes can often occur between a counselor and their clients on the issue of abortion, and clients considering abortion present both ethical and legal challenges to helping professionals. Counselors must consider all legal issues when working with such clients or they can be charged with negligence if they fail to adequately refer a client (Millner & Hanks, 2002). If counselors make referrals based on their own beliefs about abortion and not on the client's beliefs, then they may expose themselves to a lawsuit.

Due to the value-laden and emotional nature of abortion, it is important that counselors understand their own values as well as those of their clients. In addition to the consideration of their own values, counselors must take into account the type of setting or agency in which they work. Agencies that promote women's rights might take a different moral stance on abortion than that taken by a faith based organization.

Assisted Suicide.

The issue of assisted suicide and end of life decision making brings with it a number of values that must be explored if counselors are to be effective in helping clients who are engaged in decision making regarding this issue. It appears that the majority of counselors support the idea that their clients can make reasonable decisions regarding assisted suicide. Rogers (2001)

surveyed mental health counselors and found that over 80% of the respondents were moderately supportive of the idea that their clients could make well-reasoned decisions regarding their own end of life issues. Neukrug and Milliken (2011) found that 68.6% of those polled believed that it was ethical to counsel terminally ill clients about end of life decisions including suicide. Similarly,Werth and Cobia (1995) reported that 88% of the respondents in a study believed that suicide could be an appropriate decision for a client if and when that person is experiencing an unremitting hopeless condition such as terminal illness, severe physical pain, and/or psychological pain, physically or mentally debilitating and/or deteriorating conditions, or a quality of life that is no longer acceptable to the individual.

Albright and Hazler (1995) stressed that personal bias and values must be recognized and clarified before counselors deal with clients considering assisted suicide. They noted that cultural differences must be accounted for as they relate to the concepts of life and death, including religious beliefs. According to Albright and Hazler (1995), Western culture endorses the belief that life is preferable to death. The Judeo-Christian tradition affirms life as a gift from God even with all its difficulties. Smith and Perlin (1979) emphasized that "human beings have limited sovereignty over their own lives" (p. 1622) and that in the Western view "it is God, no human persons, who is the Lord of Life and Death" (p. 1622). Furthermore, they stressed that the theme of suffering and its necessity is common in Eastern religions. In Buddhist tradition, there is the belief that suffering improves karma and assures a person of better reincarnation (Smith & Perlin, 1979). Islam claims that "the moment of death is foreordained and suffering should not be avoided because it serves for expiation of sins" (Smith & Perlin, 1979, p. 655). When looking at

the values related to assisted suicide, counselors must take into account any culturally bound attitudes toward life, death, and euthanasia that may exist.

Albright and Hazler (1995) stated that counselors must keep current on the growing legal, social, and ethical information related to euthanasia and they must use this information in conjunction with their own thoroughly considered personal beliefs, and an empathic understanding of their clients. Furthermore, they recommend that counselors clarify their own beliefs and values related to these issues before they help their clients explore their own beliefs and value systems. When working with clients considering assisted suicide it is recommended that counselors take into account cultural influences, examine institutional protocols, legal precedents, and liabilities and obtain differing professional perspectives from supervisors and colleagues.

Counselors have choices to make when deciding whether to work with clients considering assisted suicide and one such option is referral. According to the ACA *Code of Ethics*, "Recognizing the personal, moral, and competence issues related to end-of-life decisions, counselors may choose to work or not work with terminally ill clients who wish to explore their end-of-life options. Counselors provide appropriate referral information to ensure that clients receive the necessary help" (A.9.b). When value conflicts arise between a counselor and a client related to end-of-life decisions, it is ethical for the counselor to refer, whereas in other situations involving value conflicts what is ethical is not always clearly defined. When value conflicts arise in relation to assisted suicide, counselors need to consider cultural variables, including religious beliefs, and the decision to counsel or to refer. When the counselor holds strong religious values

related to assisted suicide, consultation and supervision must be sought, and referral may be considered.

Premarital and Extramarital Sex.

Mental health practitioners often find themselves working with clients whose sexual values and behaviors are different from their own. Ford and Hendricks (2003) conducted a study to assess counselors' values regarding premarital sex, casual sex, extramarital sex, open marriages, sexual orientation, and sex in adolescence and late adulthood. Respondents reported that that they, as therapists, valued the following: sex as an expression of love and commitment, fidelity and monogamy in marital relationships, and committed partnerships. The researchers found that therapists experienced value conflicts and referred clients based on these value conflicts: 40% of the therapists reported that they had handled their value conflicts by referring the client, 25% discussed the issue with the client, and 18% consulted with a supervisor, colleague or peer.

Corey, Corey, and Callanan (2007) explained that religion entails a set of rules that connect clients to either a god or gods and can affect how clients handle guilt, authority and morality. Some therapists may be affiliated with religions that view pre-marital sex, extra-marital sex, and interracial relationships as morally wrong. Therefore, if therapists' religious values lead them to question the morality of their clients, they must maintain awareness of such biases and bracket them. They must counsel within the context of the client's worldview.

Sexual Orientation.

Sexual orientation is an aspect of multiculturalism and brings with it a number of values-related aspects that must be considered by counselors and those responsible for their training.

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Counselor educators are expected to "...infuse material related to multiculturalism/diversity into all courses…for the development of professional counselors" (ACA, 2005, F.6.b.). Addressing multicultural issues in the training process would include addressing any issues that a student might have working with LGBT clients. There is some evidence that practicing counselors do not have unanimity on the issue of homosexuality. Neukrug and Milliken (2011) found that more than 94% of counselors surveyed believed that homosexuality is not pathological and 96.6% believed that referring a client who was happy with his or her own homosexuality to reparative therapy was unethical. Although the percentages of counselors who believed that homosexuality is pathological or believed reparative therapy was acceptable was small, it might be anticipated that these practitioners could be more vulnerable to ethical violations and even lose their jobs if they are unable to set aside these beliefs when counseling clients.

For example, in the case of *Bruff v.North Mississippi Health Services, Inc*, a counselor employed at the North Mississippi Medical Center refused to counsel a lesbian client on her relationship based upon her own religious beliefs. Bruff, the counselor gave her religious beliefs as a reason to not counsel the client. Bruff was offered the opportunity to transfer to a Christian counseling center but refused the transfer and was eventually terminated. Bruff filed suit and although a jury in the Federal Court initially found in her favor, the court reversed the jury's findings upon appeal.

In March 2001, the United States Court of Appeals for the Fifth Circuit held that employers were not required to accommodate a counselor's request to be excused from counseling homosexual clients regarding relationship issues. The court disagreed with the counselor's claim that her employer's unwillingness to allow her to refrain from counseling

certain clients on certain issues violated federal law. In the *Bruff* case, the court determined that it was not protected under the law for counselors to provide services only to clients whose religious beliefs did not conflict with the counselor's religious beliefs. Additionally, the court recognized that allowing a counselor to not counsel based upon his or her religious beliefs might dissuade homosexual clients from seeking the counseling they desire. Bruff, by turning her client away, essentially shunned her client through the condemnation of her sexual orientation, perhaps leading to more emotional hardship for the client. Refusing to counsel homosexual clients or more narrowly refusing to counsel homosexual clients on relationship issues is therefore illegal discrimination.

Cashwell and Young (2005) explained that some counseling students who hold conservative religious values might be uncomfortable with counseling lesbian, gay, bisexual or transexual (LGBT) clients because these sexual orientations conflict with the students' religious beliefs about what constitutes an acceptable lifestyle. They suggested that, during the training process, counseling students must become aware of heterosexism and homophobia and that students should not be allowed to exempt themselves from learning about this form of social oppression any more than they would be allowed to avoid learning about the effects of racism.

Corey and Corey (2005) explained that if counselors hope to work effectively with homosexual clients, it is absolutely essential to begin by becoming aware of their own biases. Counselors must challenge their own attitudes and assumptions about homosexuality and bisexuality before they can effectively offer services to this population. Furthermore, when biases relating to working with homosexual clients do emerge, counselors must challenge any myths and misconceptions they might hold and be open to understanding how values regarding

sexual orientation are likely to affect their work. Counselors working with LGBT clients are ethically obligated not to allow their personal values to intrude into their professional work.

Cashwell and Young (2005) noted that the issue of value conflicts and homosexuality may arise during a student's practicum. When addressing how supervisors should handle working with supervisees who may be homophobic, Bruss et al. (1997) advised that supervisors clarify their expectations to their supervisees, insist that supervisees become educated about issues their particular clients might face, and expect them to acknowledge and discuss their own assumptions about working with this specific population. Burhke (1989) noted that non-homophobic supervisors must make careful judgment calls when working with a homophobic supervisee regarding the degree of homophobia and the supervisee's ability to work productively with the client. Schrag (1994) explained that when a supervisor has a positive view of homosexuality, the supervisor can serve as a role-model for the supervisee. When a supervisor determines that a supervisee is not able or willing to counsel clients who present issues relating to non-heterosexual intimacy, then the supervisor has an ethical responsibility to ensure that the supervisee is not allowed to provide services in such a way that can be harmful to the client. A supervisor can, at that point, recommend further training for the supervisee or consider developing a remediation plan to assist the supervisee.

Bernard and Goodyear (1998) stressed that supervisees should enter supervision with at least initial skills in recognizing issues that may be faced by the LGBT community along with "a readiness to assist clients in addressing intimacy issues within a gay or lesbian relationship, and a readiness to confront their own heterosexual assumptions" (p. 50). This includes having a familiarity with ethical guidelines and competencies that relate to working with this population.

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The Association for Lesbian, Gay, Bisexual and Transgender Issues in Counseling (ALGBTIC, 2011) developed competencies that, "When integrated into graduate counseling curricula, …will assist counselors-in-training in the examination of their personal biases and values regarding LGBT clients, expand their awareness of the world views of sexual minorities, and lead to the development of appropriate intervention strategies that insure effective service delivery" (ALGBTIC, 2011). It is important that counselors recognize how internalized prejudice may influence counselors' own attitudes as well as those of their LGBT clients. When it comes to the helping relationship, counselors must acknowledge the prejudice and discrimination experienced by LGBT persons and assist them in overcoming internalized negative attitudes toward their sexual orientations and gender identities. Counselors must "seek consultation or supervision to ensure that their own biases or knowledge deficits about LGBT persons do not negatively influence the helping relationship" (ALGBTIC, 2011).

Because the two recent lawsuits were brought by counseling students who intended to become school counselors, it seems appropriate to examine the issue of counseling LGBT students, as well as students who are beginning to question their sexual orientations, within the school setting. The American School Counselor Association (ASCA, 2010) recognizes the obligation of counselors not to discriminate against sexual minority students through its position statement on sexual orientation, stating that ASCA is committed to equal opportunity and respect for all individuals regardless of sexual orientation. Furthermore, ASCA's (2010) *Ethical Standards for School Counselors* prohibit counselors from discriminating against students on the basis of sexual orientation. ASCA stresses, "Each person has the right to be respected, be treated with dignity and have access to a comprehensive school counseling program that advocates for

and affirms all students from diverse populations including: ethnic/racial identity, age, economic status, abilities/disabilities, language, immigration status, sexual orientation, gender, gender identity/expression, family type, religious/spiritual identity and appearance" (p1).

In relation to multiculturalism and social justice advocacy, ASCA (2010) requires counselors to develop competencies with respect to how prejudice, power and various forms of oppression, such as genderism, heterosexism, and religionism affect self, students and all stakeholders (E.2.b). Furthermore it is expected that counselors "acquire educational, consultation and training experiences to improve awareness, knowledge, skills and effectiveness in working with diverse populations" (ASCA, 2010, E.2.c). Counselor educators and supervisors provide guidance, support and encouragement to their students and supervisees as they help them develop their own self-awareness and skills necessary to become competent school counselors. Counselor educators encourage their students to explore how their own value systems might clash with the values of their clients, including values as they relate to sexual orientation. This function of counselor educators becomes especially important in light of the two legal cases previously discussed.

Value Conflicts and Referral

An issue that is emerging in response to the *Ward v. Wilbanks et al*. and *Keeton vs. Anderson-Wiley et al*. lawsuits is whether it is ethical to refer a client when there is a serious value clash between the counselor and the client or there are extreme levels of discomfort that cannot be resolved. The counseling literature appears to be somewhat contradictory in addressing this issue. Some authors have asserted that referral is a viable option when values conflicts occur. Cottone and Tarvydas (2006) stated, "If the counselor is in serious danger of imposing values on

the client or is unable to remain objective, the counselor should consider referring the client elsewhere" (p. 74). Corey (1989) stressed that counselors should be cognizant of the impact of their religious values on the therapeutic relationship and should determine if a client should be referred because of a conflict between the client and counselor's value systems. Corey, Corey and Callanan (2011) explained that ethical therapists recognize when their values clash with those of their clients in such a way as to effect the overall effectiveness of the therapeutic relationship. They stressed that merely having a value conflict does not automatically warrant a referral and suggested that it is possible to work through such conflicts successfully. They advised that referral should be a last resort and recommended that when value conflicts do occur, it is the therapist's responsibility to work through all of the possible blocks to providing effective treatment through consultation. When it becomes evident that a counselor can no longer work with a client successfully, it is the counselor's responsibility to ensure the client that the reason for referral is because of the counselor's problem and not the client's.

Although some of the literature suggests that referral may be a viable option when there are value clashes between a counselor and a client, the literature is clear that the counselor must be willing to look at his or her part in the conflict. A counselor cannot simply keep referring all clients who present with the same problematic issue. Corey (2008) asserted that "it is not simply a matter of referring clients in cases of value clashes" (p. 22). Corey and Corey (2007) advised that it is always a good idea for counselors to think about the reasons they are motivated to refer a client. Furthermore, they suggest that if counselors recognize a pattern of frequent referrals, they might want to examine their reasons for doing so. In cases where professional experience is limited, such as while working a practicum or internship, it is a vital part of one's professional

development to be open to consultation with other professionals in an effort to upgrade one's skills. Counselor educators and supervisors must provide their students with an opportunity to safely discuss their own value systems and help them to understand how such value systems might affect their counseling relationships. Counselor educators must teach their students to recognize when they are experiencing value conflicts that might interfere with their therapeutic effectiveness.

With all of the possible scenarios for value conflicts to occur within the therapeutic relationship, counselors must consider a number of factors including legal and ethical issues, the worldview of their client, and their own worldview. Although referral may be an option when working with a client whose values clash with those of the counselor, the decision to refer must not be taken lightly and cannot be utilized simply because a counselor disagrees with the client's value system. The more specific issue of referral as an option in cases of conflicts between a counselor's religious beliefs and a client's sexual orientation is beginning to be addressed in the literature.

Counselor Educator Reactions to Issues Raised by Legal Cases

The cases involving William and Mary, EMU and ASU all involved students who, during some point in their training process, demonstrated that they were not subscribing to the basic ethical standards set forth by the *ACA Code of Ethics*. In each of these cases, the students were offered a remediation plan. When these students failed to meet the requirements set forth by their faculty supervisors, they were dismissed from their training programs. The outcomes in each of these cases indicate that when a counseling student is dismissed from a counseling program for ethical violations or the inability to meet program standards, universities will likely prevail in

lawsuits so long as they have followed appropriate procedures. Nonetheless, the two recent legal

cases have raised some difficult issues and have captured the attention of counselor educators**.**

In a recently published textbook, Granello and Young (2012) asserted that "A

fundamental premise of the counseling profession is to respect the dignity and worth of all

clients. ACA and the ACA *Code of Ethics* are both clear that multicultural competence includes

protection of gay, lesbian, bisexual, and transgendered (GLBT) clients" (p. 390). They added that

"Prejudice against clients has no place in the counseling relationship" (p. 390). They stressed that

referring GLBT clients to another counselor because of a counselor's religious values "…is not

sanctioned by the counseling profession and has practical as well as legal and ethical

implications" (p. 391) and that it is illegal to refuse to work with any clients based on their

sexual orientation because it is discriminatory.

The Association of Lesbian, Gay, Bisexual, and Transgender Issues in Counseling

(ALGBTIC), a division of the American Counseling Association (ACA), issued the following

statement in response to the events that took place in the Augusta State University case.

"Although there are no clear cut answers when certain religious beliefs conflict with queer

issues, what is currently happening with a counseling student at Augusta State University

provides us an opportunity to have important and necessary discussions about culturally

competent counselor training and dialogues about social injustices toward lesbian, gay, bisexual,

transgender, queer/questioning, intersex, and ally communities" (Chaney, 2010, p.1).

Furthermore, Chaney (2010), President of ALGBTIC, stressed that, "it is our hope that the

counseling profession will take steps to rally together to create safe spaces for these difficult

dialogues to take place, for all individuals involved" (p.1). He insisted that "in order for change

to take place, we must engage in continued dialogue about how ALL counselors can advocate for

queer clients and students. Moreover, we must dialogue about how counselor educators can

advocate for counselors-in-training who may need mentorship on their developmental journey to

cultural competence. There is absolutely no place for hate in a counseling space" (p.1).

Counselor educators who teach at EMU and counselor educators who provided expert

testimony in the *Ward* law suit were interviewed by Shallcross (2010). They identified a

dilemma regarding the need to dismiss students like Ward and Keeton but also wanting to

identify them earlier than in their training practicum (a fairness to the student issue), while at the

same time respecting students' rights to express their opinions (such as homosexuality being a

sin) in courses like multicultural counseling. According to Francis, EMU counseling professor,

"The counseling profession gets a bad rap with a segment of the population that may not

understand why we're doing what we're doing" (Shallcross, 2010, p.1). He stressed that the

counseling profession is asking counselors "to not use their systems to judge or evaluate the

person in front of them but to try and understand and work with that person from his or her

worldview system. We're seeking to understand and work within the worldview of the client,

regardless of what our worldview is" (Shallcross, 2010, p.1). ACA's Chief Professional Officer

David Kaplan explained that the EMU case is "…one of the most important court cases in the

past 25 years because it speaks directly to whether counselors can discriminate against clients on

the basis of client characteristics. The lawsuit was a direct threat to the nondiscrimination clause

within the ACA Code of Ethics" (Shallcross, 2010, p.1). He further explained, "The case affirms

that we have expected of students all along. Counseling students need to become comfortable

with the idea that they will be seeing people with very different value systems than the student

holds. That is an inherent part of our ethics – that we value diverse populations" (Shallcross, 2010, p.1). Finally, he added, "One of the most basic implications of this case is that it reaffirms the fact that meeting our clients' needs is more important than meeting our own needs" (Shallcross, 2010, p.1). Herlihy, one of the providers of expert testimony, explained, "These cases underscore the importance of having sound, clear, written gate-keeping procedures that are disseminated to students in a student handbook, that provide students with due process and that include the opportunity to remediate any identified deficiencies" (Shallcross, 2010, p.1). Furthermore, she asserted, "we have an additional obligation, in all fairness to students who invest considerable time, energy and money in pursuing their graduate degrees. We need to find ways to identify and remediate the kinds of problems that were at issue in these two cases before students reach their practicum" (Shalcross, 2010, p.1).

Taking into account the fact that the recent legal cases and their effect on the counseling community are making their way into the professional dialogue and literature, it becomes apparent that a deeper understanding of how counselor educators handle working with students who are unwilling to set aside their personal religious belief when counseling clients is needed. Very little is known about how counselor educators are dealing with this question. It is hoped that this proposed qualitative study will illuminate the topic so that the issues at hand can be understood more clearly.

Summary

This chapter provided an overview of recent legal cases involving student dismissal from counseling programs. The process of gate-keeping was addressed. The topic of remediation was discussed and legal issues with student dismissal and due process were explained. The roles of

values in counseling were discussed in general terms. Then, issues related to religious values in the counseling relationship were explored. Clinically and ethically appropriate methods of dealing with value conflicts between counselors and clients were examined and conflicts between counselors' religious values and the sexual orientation of clients was discussed. Issues that may arise in supervision relating to working with LGBT clients were presented. Reactions to the recent legal cases and student dismissals were also explored.

Throughout a counseling student's educational process quality control factors are in place to help ensure that every student is getting adequate training in ethics. *The ACA Code of Ethics,* which counseling students are expected to learn as part of their training, clearly outlines the expectations for ethical behavior required of the counseling student, the counseling supervisor, and the counselor educator. At the institutional level, CACREP standards help to ensure that gate-keeping procedures are in place within counseling programs. Practicum and internship courses are included in the curriculum to provide opportunities to practice counseling under the guidance of a clinical supervisor. Students are taught that religion is a component of multiculturalism, and that they are expected to work within the value system of the client rather than within their own value systems. Yet, some counseling students are still unwilling to set aside their religious beliefs when working with clients, forcing counseling programs to take appropriate preventative actions to protect the welfare of clients. Recent litigation clearly shows that when students are given due process, are offered a chance at remediation, and are ultimately dismissed from their programs, counseling programs are likely to prevail when the students have brought suit against them.

The issues raised by these recent legal cases may have a lasting effect on the counseling community and the field of counselor education. As the legal cases continue through the appeals process, the dialogue about the cases is likely to increase. As of April 2011, the *Ward* case is being appealed and amicus curiae (friend of the court) briefs have been filed by ACA and a number of entities in support of both EMU and of Ward (B. Herlihy, personal communication, April 17, 2011). The findings of this study may assist counselor educators in developing effective means of addressing situations in which students are unwilling to set aside their religious beliefs when working with clients and in refining the gate-keeping and remediation strategies for students who are struggling with values issues related to their religious beliefs.

CHAPTER THREE

Methodology

Introduction

In this chapter, the purpose of the study, research questions and rationale for qualitative research and methodology are described. Additionally, sections on the following are included: participants, role of the researcher, interview protocol, ethical considerations and assumptions. Furthermore, the data collection plan, data analysis plan and data reduction plan are described in detail. Finally, explanations of establishing trustworthiness, data display and the presentation of conclusions are presented.

Purpose of the Study

The purpose of this proposed study is to explore counselor educators' perceptions as they relate to working with students who are unwilling to set aside their religious beliefs when counseling clients. A review of the literature indicates that there is a general lack of research on how counselor educators handle working with students who are unwilling to set aside their religious beliefs during counseling sessions with clients. Through qualitative analysis, this study will provide insight into such experiences.

Research Questions

The primary research question being investigated is: What are the perceptions of counselor educators as they relate to working with students who are unwilling to set aside their religious beliefs while counseling clients? Further data will be obtained through exploration of the following sub-questions:

1. According to counselor educators, how does being a gate-keeper affect their decision making process when working with students who are unwilling to set aside their religious beliefs while counseling clients?

2. What do counselor educators perceive to be the primary client issues that are involved when students are unwilling to set aside their religious beliefs while counseling clients?

3. According to counselor educators, what ethical issues must be considered when working with students who are unwilling to set aside their religious beliefs while counseling clients?

4. According to counselor educators, at which point or points in a counseling student's training (i.e. during admission standards, within the curriculum, or during the supervision process) should problematic areas be addressed? How should these areas be addressed?

5. According to counselor educators, what legal issues must be considered when working with students who are unwilling to set aside their religious beliefs while counseling clients?

6. How does the fear of legal actions affect counselor educators' decision making process when working with students refusing to set aside their religious beliefs?

Qualitative Research

According to Corbin and Strauss (2008), "There are many reasons for choosing to do qualitative research, but perhaps the most important is the desire to step beyond the known and enter into the world of participants, to see the world from their perspective and in doing so to make discoveries that will contribute to the development of empirical knowledge" (p. 16). According to Richards (2005), well-designed qualitative projects are usually small, the data detailed and the techniques are designed to discover meaning through fine attention to the content of text. Qualitative research examines lived experiences in an effort to understand and

give meaning by systematically collecting and analyzing narrative materials. Methods are then used to ensure credibility of both the data and the results. Phenomenology is just one of many types of qualitative research that examines the lived experiences of humans in the hope of gaining a more thorough understanding of specific phenomena (Byrne, 2001). This research is an exploratory study focusing on the lived experiences of counselor educators. I gathered data rich in contextual detail so that I could accurately convey the meaning behind responses offered by participants in this study.

I utilized an Interpretive Phenomenological Analysis (IPA) approach to explore the lived experiences of counselor educators as they relate to working with students who are unwilling to set aside their religious beliefs when counseling clients. I selected this approach because IPA usually involves a small number of cases, is inductive, and seeks out an exploratory stance towards participants allowing for greater depth of insight (Shank, 2002). Smith (2003) explained that IPA is a good approach when one is trying to understand how individuals are perceiving the particular situations they are facing and how they are making sense of their personal and social world. Based on the idea that phenomenology is used to study how humans come to understand the world through the interpretation of their experiences, IPA is an appropriate qualitative approach for my research study.

IPA is a qualitative research design that uses interviews to help a researcher understand how an individual experiences a certain phenomenon. Participants' responses are then interpreted by the researcher to extract themes relevant to the research question. A researcher using IPA does not start collecting data with hypotheses already in mind. Smith (2003) explained, "The data defines how the research question is answered. Research questions in IPA projects are

usually framed broadly and openly. There is no attempt to test a predetermined hypothesis of the researcher; rather, the aim is to explore, flexibly and in detail, an area of concern" (p. 55).

Participants

Smith posited, "IPA studies are conducted on small sample sizes. The detailed case-by-case analysis of individual transcripts takes a long time, and the aim of the study is to say something in detail about the perceptions and understandings of this particular group rather than prematurely make more general claims" (p. 55). For my study, I used a small sample size and for the purposes of this study, there was no specific consideration given to age, gender, or race of the participants. All qualifications expected for the participants were verified through each individual interview. I interviewed participants, each of whom were working as a counselor educator at the time of the interview. Each participant had one or more years of experience in the counseling field as a professor and held a doctorate in counselor education or a related field. In phenomenological studies, it is understood that participants must have experienced the same phenomenon and be able to describe their experiences (Creswell, 2007). I collected data from participants who actually worked with students unwilling to set aside their religious beliefs when working with clients or who have had colleagues who have faced this issue.

I utilized purposeful criterion sampling for recruitment of participants. By using purposeful criterion sampling, the researcher is interested in finding samples that can provide information on the topic being studied as opposed to randomly selecting a sample (Corbin & Strauss, 2008). This purposeful selection of respondents is intended to provide information-rich data that reflect each participant's own personal perspective. In an IPA study, the "researcher begins by recruiting participants who have expertise with the phenomenon under study by virtue of it being

an integral part of their life experiences. According to Smith (2003), "IPA researchers usually try to find a fairly homogeneous sample. The basic logic is that if one is interviewing, for example, six participants, it is not very helpful to think in terms of random or representative sampling. IPA therefore goes in the opposite direction and, through purposive sampling, finds a more closely defined group for whom the research question will be significant" (p. 56).

For my study, I requested from each member of my dissertation committee the name of a counselor educator working within a university setting who they feel might be interested in participating in my study. From that list, participants were chosen for the study in a snowball fashion. Snowball sampling is a chain sampling technique in which existing participants recruit future participants from among their acquaintances (Heckathorn, 1997). This type of sampling allows the researcher to use contacts to obtain a list of potential participants who might be qualified and willing to participate in a study that lets them share their own personal perspectives on the experience at hand.

Throughout the research process, I asked each participant to recommend a future participant who he or she might see as a potential interviewee based on the criteria previously set. Corbin and Strauss (2008) recommended that the researcher continue sampling until reaching the level of data "saturation" at which time no new categories or themes seem to be emerging. Although my proposed number of participants was approximately eight, I continued to collect data up until the point of saturation. Richards (2005) recommended that saturation will occur when I am no longer getting anything new out of my data.

Role of the Researcher

According to Corbin and Strauss (2008), "…qualitative research allows researchers to get at the inner experience of participants, to determine how meanings are formed through and in culture, and to discover rather than test variables" and "committed qualitative researchers lean towards qualitative work because they are drawn to the fluid, evolving, and dynamic nature of this approach" (p. 13). Furthermore, they proposed that those who excel at qualitative research tend to have a humanistic interest, curiosity, creativity, imagination, sense of logic and the ability to recognize diversity. They stressed that a good qualitative researcher should have a willingness to take risks, the ability to live with ambiguity and the ability to work through problems. Finally, the qualitative researcher must accept his or her self as the research instrument and trust in the self and the ability to see value in the work that is produced. Taking these characteristics into account and understanding that the role of the researcher is to accurately portray to the best of his or her abilities an understanding of the phenomena at hand, I embraced my natural tendencies (i.e. curiosity, creativity, logic, and humanistic interest) and let these qualities guide me as I balanced these characteristics with ethical considerations and a strong methodology to support my findings.

I am personally interested in the concepts of religion and spirituality as they relate to the field of counseling. Although I do not subscribe to any specific religious or spiritual paradigm, I do believe that religion and spirituality are important components in people's lives. I am a strong proponent of holistic counseling and believe that when counselors work with clients, they are most effective when they do so in a way that accounts for all aspects of the individual, including those that relate to the mind, body and spirit. It is my opinion that if counselors or counselor

educators specifically avoid addressing certain subjects (such as religion), they would be missing a major component of their clients' or students' worldview. While conducting a study on how counselor educators deal with students who are unwilling to set aside their religious beliefs during the counseling session, I constantly maintained an awareness of my own biases and worked to ensure that my own belief system does not interfere with the collection, analysis, or interpretation of my data.

I believe that rigid dogmatic thinking is the antithesis of what counselors are taught in relation to working within the value system of our clients and that judgment of any sort (especially that of a religious nature) is harmful to the client. I believe that when counselors refuse to work with any population based upon the counselor's beliefs, this presents a situation in which clients may experience feelings of shame and guilt. I bracketed my biases by stating that I conducted this study through the lens of a counselor who adamantly subscribes to the ideas of genuineness, unconditional positive regard and empathy. As a counselor, I have been trained to work within the value system of my client even if that falls outside the realm of my own value system. I have been taught the importance of not bringing harm to my clients and I have been taught to respect all aspects of an individual's worldview. Counselors are instructed to be "…aware of their own values, attitudes, beliefs, and behaviors" and are encouraged to "avoid imposing values that are inconsistent with counseling goals" as they "respect the diversity of clients" (ACA, 2005, A.4.b.). Furthermore, counselors are expected to not "condone or engage in discrimination based on age, culture, disability, ethnicity, race, religion/spirituality, gender, gender identity, sexual orientation, marital status/ partnership, language preference, socioeconomic status, or any basis proscribed by law" (ACA, 2005, C.5.). I strongly believe in

and am committed to ethical standards set forth by the *ACA Code of Ethics* (ACA, 2005). I personally believe that ethics should be at the foreground of all counseling relationships. I believe, as the *ACA (2005) Code of Ethics* states, "Students have the same obligation to clients as those required of professional counselors" (F.8.a.). In my opinion, professional counselors undergo an intensive training process that helps them to draw out and create an awareness of their own biases. However, I must bracket this by stating that I am looking at this study through the eyes of a counselor who believes that counseling students should not be allowed to counsel clients in situations in which their (the counselors') issues might interfere with the welfare of clients.

Furthermore, being a student who is currently training as a counselor educator, I am very familiar with the role of gate-keeping and am highly interested in how others in the field might address the personal, professional, ethical, and legal issues that may emerge when they work with students who are unwilling to set aside their personal religious beliefs when counseling clients. I believe that counselor educators have an ethical responsibility to not allow counselors into the field who are underequipped in their own ethical training. When counseling students are unable to demonstrate a competent understanding of the curriculum being taught, counselor educators must "1. assist students in securing remedial assistance when needed, 2. seek professional consultation and document their decision to dismiss or refer students for assistance, and 3. ensure that students have recourse in a timely manner to address decisions to require them to seek assistance or to dismiss them and provide students with due process according to institutional policies and procedures" (ACA, 2005, F.9.b.).

Taking into account my strong belief in ethics and in gate-keeping, I monitored and acknowledged my biases from the very beginning of the study to ensure that they did not interfere with my data collection, interpretations, and findings. I was cognizant to keep my biases in check during the interview procedure so as to not sway participants' responses in one direction or another.

Interview Protocol

My interview protocol was semi-structured and was designed so that I would maintain focus on the questions for this research study and not stray too far from the topic of interest. When writing about IPA, Smith (1999) explained, "With semi-structured interviews, the investigator will have a set of questions on an interview schedule, but the interview will be guided by the schedule rather than be dictated by it" (p. 58). He also explained that with a semi-structured interview, "There is an attempt to establish rapport with the respondent, the ordering of questions is less important, the interviewer is freer to probe interesting areas that arise and the interview can follow the respondent's interests or concerns" (p. 58).

There are many advantages of the semi-structured interview. According to Smith (1999) "It facilitates rapport/empathy, allows a greater flexibility of coverage and allows the interview to go into novel areas" (p. 58). Furthermore, he explained that the semi-structured interview "tends to produce richer data" (p. 58). However, he does warn "On the debit side, this form of interviewing reduces the control the investigator has over the situation, takes longer to carry out, and is harder to analyze" and "…the interviewer needs to make sure that the conversation does not move too far away from the agreed domain" (p. 58).

Taking Smith's (1999) recommendations into account along with the suggestions posed by Shank (2006), I generated a list of critical questions based upon my general research questions (see Appendix A). From the list of protocol questions, I decide which were the most important and began each interview with those specific questions. The rest of the questions were used as a checklist to ensure that each question had been covered.

Ethical Considerations

Prior to conducting the study, I obtained permission from the University of New Orleans' Institutional Review Board (IRB) to pursue data collection from the intended interviewees. Throughout my study, the confidentiality of each participant was maintained and each participant was given the option to withdraw from the study at any time and for any reason. Furthermore, each participant was provided with an overview of his or her rights as a participant.

Once IRB approval was received, a consent form (see Appendix B), outlining the intent of the research, participant criteria, the significance of the research study, the rules of confidentiality and the parameters of the study was sent to selected participants. Initial contact with potential participants was made through email. The email message requested participation and informed participants that they would be contacted via telephone within seven days of the date the document is sent. I began each interview with reading the consent form to make sure that each participant understood the study, its purpose, its procedures and his or her rights as a participant. After discussing the consent form and my commitment to confidentiality, I asked again, just to confirm, whether the participant fully understood everything covered. Once the interviews were completed, pseudonyms were assigned to each participant to ensure that no identifiable names are revealed.

Assumptions

My primary assumption was that research participants would openly share their own personal experiences, insights, beliefs and perceptions regarding working with students who are unwilling to set aside their religious beliefs during counseling sessions with clients. My second assumption was that each participant would be able to offer insight that was unique to his or her own personal experience as it relates to the topic being studied. Additionally, I assumed that the answers provided by each research participant would be beneficial in the development of themes that would ultimately help qualify the underlying findings of my study (Shank, 2006). Furthermore, I assumed that all participants would provide answers that were rich and descriptive (Corbin & Strauss, 2008), allowing me to accurately capture their perceptions through my well thought out research plan.

Data Collection Plan

My data collection was done through interviews with each participant. I conducted and transcribed all individual interviews. In cases when the research participant is unable to meet face-to-face, a confidential phone interview was conducted or the use of Skype was implemented. The interviews were recorded by a digital audio recorder. Furthermore, each interview was transcribed verbatim by the researcher and each interviewee was provided with an informed consent form giving him or her right to withdraw from the study at any time. A participant consent form, explaining the purpose of the study, was provided and reviewed with each participant to reinforce that each participant did indeed understand his or her role in the study, its purpose, and his or her rights as a participant (see Appendix B). To further clarify that my participants understood their role in the study, I asked each participant for confirmation that

they understood everything discussed in the consent form and allowed participants to ask questions. Each interview began only after the participant conveyed that he or she understood his or her rights as related to the study.

The confidentiality of each participant was maintained in two specific ways. First, no identifiable information (name, place of employment) was provided to anyone other than the researcher and his dissertation committee chair at any time during the study. Second, for added security, all audio recordings and transcribed notes were kept in a private, locked, secure location. Any email correspondence was conducted only on my personal laptop. Any and all electronic interactions were immediately printed and deleted from my inbox. Once collected, the data was compiled into manageable sections for analysis.

Before the interview process was implemented, participants were contacted to confirm their willingness to participate in the study. The location of each interview was determined by each participant and then agreed upon by both the researcher and the participant. Participants were given the option to define the parameters of their own interview, being given the option to participate either face to face, via telephone or through Skype. The interview protocol and list of questions were the same for all interviews to ensure that the same set of questions were asked in a similar manner to each participant. Shank (2006) reported that semi structured interviews allow the interviewer some latitude in how questions are asked but that all interviewees are asked the same general questions. The purpose of each interview was to obtain an overview of the participant's lived experience of working with students who are unwilling to set aside their religious beliefs while counseling clients. A time period of one hour was devoted to each interview with a 15 minute window allotted for clarifying questions to be posed. However,

Shank (2006) advised that an interview should never be forced; if it starts to lose momentum before the allotted time is up the researcher should allow the interview to take its natural course. The same rule applies for an interview that runs a bit over time; Shank (2006) recommended that the researcher keep going as long as the interview is going strong.

Data Analysis Plan

This research study was designed specifically to gain a deeper understanding of the phenomenological nature of the experiences of counselor educators as they relate to working with students who are unwilling to set aside their religious beliefs when counseling clients. Corbin and Strauss (2008) recommended that analysts begin coding soon after the data are collected, because this will serve as the foundation for further data collection and analysis. I reviewed sections of transcripts in an attempt to extract as much detail as possible from each section. "Detailed work like this in the beginning is what leads to rich and dense description" and to a "well-developed theory" (Corbin & Strauss, 2008, p. 163). When using IPA, "There are no rules about what is commented upon, and there is no requirement, for example, to divide the text into meaning units and assign a comment for each unit. Some parts of the interview will be richer than others and so warrant more commentary. Some of the comments are attempts at summarizing or paraphrasing, some will be associations or connections that come to mind, and others may be preliminary interpretations" (Smith, p. 67). Extracting details and dividing the texts into meaningful sections are ways to manage the data through reduction. Richards (2006) wrote "the critical question is not whether you should reduce the data, but when" (p. 52) and suggested, as a rule of thumb, "…your data record should be as large as it needs to be and as small as it can be" (p. 54).

Data Reduction

Most examples of thematic analysis involve an inductive process (Shank, 2006). Through an inductive process, I transcribed and coded my data allowing me the opportunity to interpret, describe, create and compare emerging categories that result into themes. I began with transcribing each audio taped interview verbatim. To ensure accurate transcription, I checked the transcribed text against the original audio tapes. Once transcription was completed, I systematically reviewed the text as I added notes to the margins in an attempt to draw out and bracket my biases. In an explanation, Padgett (2004) proposed that bracketing was the conscientious and constant effort to suspend our own assumptions, beliefs and feelings so that we may better understand the experiences of our participants. Also when reviewing the transcribed text, I coded the raw data by using key words to identify emerging categories. For example, based upon my research questions, responses relating to legal issues emerged and were therefore placed into categories within this theme, responses relating to gate-keeping fell into other categories, and responses related to ethics fell into other categories. According to Richards (2006), this type of coding is known as topic coding and it is often the dominant form of coding early in the project.

Smith recommended multiple read-throughs of the transcript. After the initial read-through, Smith recommended "one returns to the beginning of the transcript, and the other margin is used to document emerging theme titles. Here the initial notes are transformed into concise phrases which aim to capture the essential quality of what was found in the text. The themes move the response to a slightly higher level of abstraction and may invoke more

psychological terminology. At the same time, the thread back to what the participant actually said and one's initial response should be apparent" (p. 68).

Smith (1999) explained how themes are developed in IPA by stating, "There are no rules about what is commented upon, and there is no requirement, for example, to divide the text into meaning units and assigned a comment for each unit." Furthermore "some parts of the interview will be richer than others and so warrant more commentary. Some of the comments are attempts at summarizing or paraphrasing, some will be associations or connections that come to mind, and others may be preliminary interpretations" (p.67). Once the themes began to emerge from the categories, I incorporated them into a table of themes. Thematic labels are not rigid and therefore must allow for refinement or change of emergent themes (Strauss & Corbin, 1998). Each conceptual label reflected my interpretation of the text. I then took each section of text and continued with my analysis. Repetition of this process led to a more accurate and deeper understanding. Shank (2006) explained that what we call themes are merely patterns that can be organized in such a way that they characterize different segments of the data.

Once I completely reviewed the text, I had a peer reviewer do the same and requested feedback on his perceptions of my choices of themes based on the original transcriptions. The rationale for this procedure was to ensure that my biases were bracketed and to have a reference point from a peer who does not share my biases.

Establishing Trustworthiness

The basic question addressed relating to trustworthiness, according to Lincoln and Guba (1985), is: "How can an inquirer persuade his or her audiences that the research findings of an inquiry are worth paying attention to?" (p. 290). Trustworthiness is seen as unitary concept

composed of dependability, credibility, transferability, and confirmability (Lincoln & Guba 1985). Essentially, it is the degree to which the research findings can be trusted. I used three methods to address trustworthiness: member checks, audit trail, and peer review. Measures were taken to establish trustworthiness throughout my entire research process. Following my initial interviews, member checks were implemented. The creation of my audit trail paralleled my data reduction and data analysis. Finally a peer reviewed my theme development. By relying upon three data confirming strategies, I implemented triangulation (Shank, 2006). Richards (2005) explained that using multiple approaches promises interesting results because it allows for the same questions to be answered in different ways.

Maxwell explained member checks with participants as "the single most important way of ruling out the possibility of misinterpretation of the meaning of what they say and the perspective they have on what is going on" (p. 94). I implemented member checks, as suggested by Richards (2005) to confirm that I was viewing data in such a way that was consistent with what the participants reported. As suggested by Padgett (2004), by conducting member checks, I was able to guard against investigator bias by verifying my data and interpretations with the participants of my study. For my member checks, once I had the transcribed recordings (approximately one week later), I provided each of my participants through email correspondence an attachment containing his or her transcribed interview along with a written summary explaining my understanding of the data. I emailed each of my participants and asked if they had anything further that they would like added to the transcripts and I offered them the opportunity to make any further comments regarding their transcribed interviews.

Throughout my study, I used an audit trail to keep track of my decision making process. The actual creation of the audit trail occurred throughout the data reduction and data analysis portions of my study; however, the finalized, written audit trail was provided at the end of my study once the findings were determined. The audit trail served as a roadmap to help me determine how I came to make certain decisions. Keeping a detailed audit trail allowed the reader to understand the decision making that lead to the ultimate findings (Richards, 2005). For the purposes of my study, the audit trail included a brief overview of my transcripts, rationale for my theme development, and a summary of overall findings.

At the point in my study when the coding was complete and themes had been identified, I designated a peer reviewer to review my analysis along with any personal notes explaining how I came to derive each theme. The peer reviewer I choose had familiarity with qualitative methodology and was trained in the field of counselor education. I provided my peer reviewer with a copy of each transcript and an overview of the themes I derived from the data. I requested that my peer reviewer review my themes and I asked for feedback. I asked the peer reviewer if he agreed with the themes I identified and also asked if there were any themes that he thought I might have missed. I had my reviewer sign a confidentiality form stating all information reviewed was confidential (see Appendix C). I also explained in the participant consent form that participants' responses to interview questions will be viewed by a peer reviewer (see Appendix B).

Once my peer reviewer reviewed my overview, I arranged for a face to face meeting with him so that we could engage in further dialog about my findings. Lincoln and Guba (1985) suggested that peer reviewing, or auditing by an outside researcher familiar with qualitative

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methods, can assist in the reduction of researcher bias. Peer debriefing is defined as "the process of exposing one's self to a disinterested peer in a manner paralleling an analytic session for the purpose of exploring aspects of the inquiry that may otherwise remain only implicit within the inquirer's mind" (Lincoln & Guba, 1985, p. 308). The purpose of having my analysis peer reviewed was to help expose my own researcher bias in a way that brings with it constructive feedback for improving my methodological rigor (Lincoln & Guba, 1985) as well as to help me identify if perhaps I had overlooked or misinterpreted themes.

Data Display and Presentation of Conclusions

Smith recommended, "The next stage is to produce a table of the themes, ordered coherently" (p. 74). For my study, once the themes emerged, the results were presented and displayed in a table of themes. Tables listed each emerging theme and provided an identifier to note which participants discussed which themes. According to IPA, "once each transcript has been analyzed by the interpretative process, a final table of super ordinate themes is constructed" (p.74).

I charted responses that accurately reflected the responses provided by the participants. Furthermore, I mapped out emerging themes to help demonstrate any pressing issues that may help lead to future studies related to my topic. The rationale for this was to amplify the experiences of my individual participants and give voice to the phenomenon at hand. Because qualitative research has the tendency to become fluid as the research progresses (Richards, 2005), I continued to explore the most appropriate means of data display depending upon the underlying message I was trying to convey at any given point in the project. The main goal of my data display was to provide an easily understandable and accurate depiction of my findings so that they could be beneficial to anyone seeking a deeper understanding of how counselor

educators work with students who are unwilling to set aside their religious beliefs during their counseling sessions with clients.

Summary

In this chapter, the purpose of my study, research questions and rationale for qualitative research and methodology were described. Additionally, sections on the following were included: participants, role of the researcher, researcher bias, interview protocol, ethical considerations and assumptions. Furthermore, the research plan, data collection plan and data analysis plan were described in detail. Finally, explanations of data reduction, data display and an overview of establishing trustworthiness were presented. All of the above were explained in detail as they pertain to understanding the experiences of counselor educators as they relate to working with students who are unwilling to set aside their personal religious beliefs while counseling clients.

CHAPTER FOUR

Results

The purpose of this study was to explore counselor educators' perceptions of working with students who are unwilling to set aside their personal religious beliefs when counseling clients. Open ended interviews were conducted with seven participants to obtain their perceptions. Each interview was transcribed verbatim and a copy was sent to each participant for a member check to ensure accuracy. All transcripts were coded into categories, the categories were clustered into themes, and the themes were cross-analyzed and clustered into super-ordinate themes. All categories, themes and super-ordinate themes were reviewed by a peer reviewer to ensure that they were being interpreted accurately. Once the peer reviewer reviewed the coded transcripts and suggestions for category and theme development, I met with the peer reviewer to discuss any concerns and to discuss my rationale for theme development. Throughout the analysis process an audit trail was maintained to document each step. In Figure 1, the process of data analysis utilized to answer the research questions is depicted.

Figure 1

Data Analysis
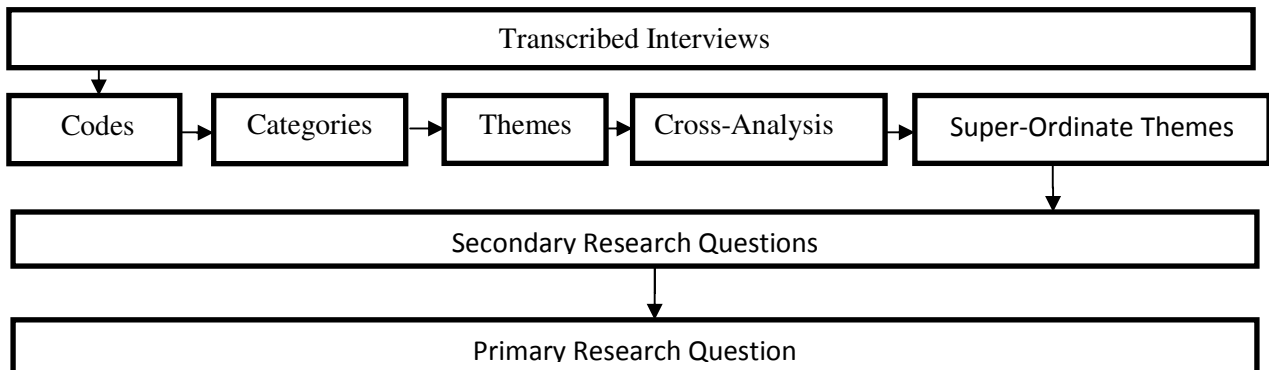
In this chapter, the findings are reported. Demographic information about the participants is presented, and the results of the study are provided. The interviews were conducted using an IPA approach that focuses on the development of themes from categories that have emerged from coding the data. When using IPA, "There are no rules about what is commented upon, and there is no requirement, for example, to divide the text into meaning units and assign a comment for each unit. Some parts of the interview will be richer than others and so warrant more commentary. Some of the comments are attempts at summarizing or paraphrasing, some will be associations or connections that come to mind, and others may be preliminary interpretations" (Smith, 1999, p. 67).

Data Analysis Procedures and Research Questions

An in-depth analysis of the interview transcript for each participant was undertaken. The participants are introduced in this chapter in the same sequence in which the interviews were conducted. Adhering to the steps of IPA, data were collected from interviews with each participant. The first step of IPA required that transcribed interviews be read several times for a thorough understanding. During this process, the text was coded. After each read-through, codes pertaining to the emerging categories were recorded in the margins of the transcripts. All of the participants' perceptions of working with students unwilling to set aside their personal religious beliefs while counseling clients that surfaced in the data were noted in the margin of the transcripts and categorized. Actual quotes from each participant were highlighted and included to support the findings being presented to answer the research questions.

The primary research question was: What are the perceptions of counselor educators as they relate to working with students who are unwilling to set aside their religious beliefs while counseling clients? The secondary research questions were:

1. According to counselor educators, how does being a gate-keeper affect their decision making process when working with students who are unwilling to set aside their religious beliefs while counseling clients?

2. What do counselor educators perceive to be the primary client issues that are involved when students are unwilling to set aside their religious beliefs while counseling clients?

3. According to counselor educators, what ethical issues must be considered when working with students who are unwilling to set aside their religious beliefs while counseling clients?

4. According to counselor educators, at which point or points in a counseling student's training (i.e., during admission standards, within the curriculum, or during the supervision process) should problematic areas be addressed? How should these areas be addressed?

5. According to counselor educators, what legal issues must be considered when working with students who are unwilling to set aside their religious beliefs while counseling clients?

6. How does the fear of legal actions affect counselor educators' decision making process when working with students who refuse to set aside their religious beliefs?

Staying true to IPA, categories were then clustered into themes based on the researcher's interpretation of the intended meaning of the participants' responses. During this process

consideration was given to the emphasis that each participant placed upon certain categories. Titles were applied to these themes and were then compared to the actual transcribed words of each participant to further confirm the presence of a connection. Another review of the data was then conducted to determine the importance each participant placed on the themes that emerged from the written transcripts. A final list of themes was constructed to show which themes appeared most significant for each participant. This identical interpretative process was followed for all seven participants in this study. Once themes were identified for all seven participants a cross case analysis was conducted; themes that emerged and that were emphasized in the greatest detail were then labeled as the super-ordinate themes and used to answer the research questions.

Participant Demographics

A total of seven participants were interviewed, all of whom were counselor educators who have been in the field of counseling for at least one year and who have had experience working with students who are unwilling to set aside their personal religious beliefs while counseling clients. Five participants were female and two were male and they had worked as counselor educators for an average of 13 years. The ages of the participants ranged from 33 to 70 and their average age was 49. Six of the participants were Caucasian and one was African American. Three participants reported that they were raised Catholic; only one reported that she was still a practicing Catholic. Two participants reported being Lutheran (Christian); only one reported that he still actively practiced. One participant reported being Baptist. One reported being raised Jewish but that her current practices were based in the Buddhist belief system. Pseudonyms were applied to all participants for confidentiality.

Mary is a 70-year-old Caucasian female who has been a counselor educator for 28 years and who has worked in two universities. She is currently the counseling program director at a private, liberal arts college and reports that she subscribes to the Catholic religion. Elizabeth is a 33-year-old Caucasian female who has been working as a tenure-track counselor educator for one academic year. Carl is a 60-year-old Caucasian male who has been working as a counselor educator for six years. Prior to becoming a counselor educator he was a Lutheran minister. He currently serves on a state licensing board for counselors. Susan is a 39-year-old Caucasian female who has been a counselor educator for 11 years, is tenured, and worked at four universities prior to accepting her current position at a private Jesuit Catholic university. Tina is a 50-year-old Caucasian female who has been a counselor educator for 20 years. She is tenured and has worked at four different universities. She was raised Jewish but states that most of her current spiritual practices are Buddhist based. Janet is a 34-year-old African American female currently on the tenure track at her university. She has been a counselor educator for nine years, has taught at three universities, and subscribes to the Baptist religion. Roger is a 51-year-old Caucasian male who has been working as a counselor educator for 20 years. He has worked at five universities and is not tenured. Although he was raised Catholic, he currently leans more towards a Unitarian and a Universalist spiritual perspective. Participant demographics are presented in Table 1.

Table 1

Participant Demographics

Name	Mary	Elizabeth	Carl	Susan	Tina	Janet	Roger
Age	70	33	60	39	59	34	51
Race	C	C	C	C	C	AA	C
Gender	F	F	M	F	F	F	M
Education	PhD	PhD	PhD	PhD	PhD	PhD	PhD
Religion Raised	Catholic/ Christian	Lutheran Christian	Lutheran Christian	Catholic	Jewish	Baptist	Catholic
Religion Practicing	Catholic/ Christian	None	Lutheran Christian	Eclectic	Buddhist	Yes	Universal
Number of Years as a Counselor Educator	28	1	6	12	17	8	20

Note: AA - African American, C-Caucasian

Participants' Interviews

Mary

The first participant, Mary, is a 70-year-old Caucasian female. When I interviewed Mary,

she shared personal details of her experiences as a counselor educator working with students who

are unwilling or unable to set aside their personal religious beliefs when counseling their clients.

She explained in depth her thoughts based upon her own experiences in the field. When asked if

she had any experience working with counseling students unwilling to set aside their personal

religious beliefs she said, "Yes…actually two…we made the referral that they transfer …" When

asked if she knew of any colleagues who had a similar experience she replied, "Yes ... in fact the

four of us were in concert for the transfer of our students out of our program. We gave them

remediation…with regards to the religious component…they really were better placed

[elsewhere]."

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Emerging Categories and Themes

An interpretation of the transcripts of the interview with Mary originally resulted in 24 individual categories that emerged from the coded data. While reviewing the 24 categories, I identified connections among the categories which were then clustered into themes. The interpretative process I undertook at this point in IPA produced eight themes. In identifying each theme, I took into account the emphasis that Mary placed on each as well as the overarching themes that emerged when clustering the individual categories together. I selected quotes as evidence to support the themes interpreted from the data. The process of selecting quotes required an exhaustive review of the transcribed interviews with Mary to ensure her words were analyzed in the context in which they were stated. Following IPA procedures, each theme was assigned a descriptive title that conveyed the essence of the meaning. The eight themes were gate-keeping, documentation, helping students explore their own values, remediation, career fit, harm to clients, imposition of values, and competencies.

When Mary discussed the theme of gate-keeping, she described speaking to a student in these terms: "… you are not matching the goals of this program that adheres to the highest standards. So we need to make a recommendation for you to withdraw." She stated that "…we really do look at it as – [if] you can't endorse them, you don't graduate them…that is very, very important."

Addressing the theme of documentation, Mary offered this advice: "...you have to have some procedures in place…and to kind of have a little bit of forethought and foresight…you hear that all the time -- document, document, document…" Mary also discussed helping students explore their own values. She stressed that students should be given the opportunity "…to

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explore their own issues" and explained, "I think that's really key…to be able to give them an opportunity to explore issues that they may see come up for them during the training process."

Additionally, Mary discussed the themes of remediation and career fit. She explained that "we've had to utilize the remediation part of the dismissal for non-academic reasons…in areas of discrimination." In discussing former students, she stated that "we gave them remediation…with regards to the religious component…they really were better placed for the Baptist Theological [Seminary]."

Mary also addressed the themes of harm to clients and imposition of values. She explained, "when you've built up a really strong therapeutic relationship and then all of the sudden…some things begin to happen and you say 'I cannot work with you anymore'…you can't abandon your client…It's unethical." Mary stressed,

> If students are not willing to be sensitive to diversity issues, religious and spiritual
>
> issues…if they're not willing to demonstrate that sensitivity then they're not meeting the
>
> standards…and we can go to the CACREP standards, we can go to the NBCC
>
> standards…and we can say that their imposition of values on clients is unethical.

Discussing the theme of competencies, Mary said, "…it's so important that students are trained in the implementation of the competencies." She continued "…it's actually those competencies…those six constructs…and those 14 competencies that really do prepare counselors in training to address client needs." Furthermore, she explained, "I think throughout the curriculum there are appropriate courses where those competencies would fit in…especially in ethics."

Summary of Mary's Interview

The eight themes identified in this interview (gate-keeping, documentation, helping students explore their own values, remediation, career fit, harm to clients, imposition of values, and competencies) provided insight into Mary's perceptions. Mary, having been a counselor educator for nearly 30 years, was able to offer a perspective that reflected her personal experiences of working with students who were unwilling to set aside their personal religious beliefs when counseling clients. Mary was a strong proponent of gate-keeping and she believed that some students might not be an appropriate match for a counseling program's curriculum.

Elizabeth

Elizabeth is a 33-year-old Caucasian female who has been working as a tenure-track counselor educator for one academic year. She reported that she was raised Lutheran, but that she is currently not active in any religion. Elizabeth was open and willing to share her experiences of working with students who are unwilling to set aside their personal religious beliefs when counseling clients.

When asked if she had any experience working with students who refuse to set aside their personal religious beliefs when counseling clients, she stated, "I'm not sure if I can articulate it quite in that direct way. In my courses we have had lots of dialogue about -- typically about -- multicultural issues and the ethical mandate that we can't impose our values on clients." However, she clarified by saying that "there does seem to be an assumed or indirect connection" and "most of the time this relates to sexual orientation." When asked if she knew personally of any other counselor educators who have experienced working with students who were unwilling to counsel clients based upon their own religious beliefs, she replied, "Oh yeah." She continued

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with "when I go to conferences I always go to these presentations…I've heard faculty from all over talk about a variety of things and yes, they have talked about students who were unwilling to work with certain populations..."

Emerging Categories and Themes

During initial coding of the data, 29 individual categories emerged that were then clustered into 13 themes. The interview transcripts were reviewed multiple times to derive individual categories. In identifying each theme, I took into account the emphasis that Elizabeth placed on each category as well as the overarching themes that emerged. The 13 themes emerging from the interview with Elizabeth were gate-keeping, parallel processes, fear of legal repercussions, due process, remediation, early intervention, advising students to seek spiritual guidance, career fit, imposition of values, helping students explore their own values, harm to clients, competencies, and referral.

Regarding gate-keeping, Elizabeth stated that "I think it's always an issue…it's so central to my experience. I feel it present with me at all times." She explained that "for me, gate-keeping really is fundamental for one purpose and that's protecting clients." Additionally, the theme of parallel processes emerged as Elizabeth explained,

> I feel so strongly about our fundamental responsibility to respect everyone's background and rights and then the same needs to go for these students…we have to extend the same courtesy to them that we're expecting them to extend to the clients…and so keeping it non-adversarial. But it's a dialogue and a discussion that it's for us it needs to be something that we are aware of our boundaries and our own beliefs… which typically conflict directly with the students we're working with…

She also added,

> Some faculty who… have taught the practicum and internship and have worked with the
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> doctoral students who were supervising the masters students…and it's the master's
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> students who are struggling with their religious values and the doctoral student struggling
>
> with wanting to be rid of the master's student…And then it gets all this parallel process
>
> that it gets so complicated.

When asked if she had any fear of legal repercussions from students who may be removed from her program, she stressed that "…it's definitely something I consider!" She then emphasized that "the thing that's important to me is that the fear not be a part of my decision making." Also, Elizabeth discussed the theme of due process, reflecting that "…the main one that I consider when I've been pondering how to move forward in my situation is always due process and I doubt many faculty are gonna have that response." She stressed, "…the student really has to be given the opportunity to respond to these evaluations and needs to be given the time to do that." Elizabeth reaffirmed "...that's probably the first thing that I think of from the legal standpoint, is that if I know I have a valid foundation in due process then the rest of it is probably going to be ok."

Elizabeth acknowledged that her program readily institutes the use of remediation plans and that she personally has been involved in developing them. When asked what she considered to be effective interventions that could be included in a remediation plan for a student unwilling to set aside his or her personal religious beliefs when counseling clients she stated:

> There's nothing in the literature about that in general … far less specific to what
>
> interventions are appropriate for which student behaviors and for this one my main

thought would be increased supervision or maybe if it was supervision with a doctoral

student to have a faculty member in there as well … depending on whatever the behavior

was of the student … if there was risk of harm to clients, whether they would need to be

removed from practicum or depending on the time-table, delayed from starting their

practicum.

Elizabeth explained that a "remediation plan should match the articulated area the

students struggling in and so it would be to help them gain multicultural competence."

Furthermore, the theme of early intervention emerged when she stressed that there are often early

warning signs when working with students "based on my own experience with my student and

then with my research, that a lot of these students are giving off warning signs well before they

reach their practicum and internship." She continued, "…my goal for us as a field would be that

we're responding to those warning signs early in the student's program of study, long before they

would ever be alone in a room with a client."

The theme of advising students to seek their own spiritual guidance emerged along with

the theme of career fit. Elizabeth posed the question, "…so how do we help assist these students

with their development in either confronting their values and how they will handle those…or

helping them reach a decision that maybe this isn't the career they thought it was?" Elizabeth

explained, "I would probably recommend that the student…depending on the situation, seek their

own counsel with their spiritual leader independent of us….and then maybe even career

exploration."

Elizabeth also discussed the themes of imposition of values and helping students explore

their own values. She explained that if a student refused to work with a client based upon

religious beliefs, a number of issues could arise, such as "…the harm to client welfare…client abandonment…imposing values on the client and even just the fundamental lack of respect and judging of the client." She explained, "...in my courses we have had lots of dialogue about typically about multicultural issues and the ethical mandate that we can't impose our values on clients." She stressed that students need to know "…how to distinguish between personal and professional values…how to know what appropriate boundaries are and to not impose their values on their clients." She recommended that counselor educators help students explore their own values, recommending they "…start from day one with assignments, activities and discussions that help them explore their personal values."

Elizabeth discussed the theme of harm to clients. She explained that "They could feel judged, persecuted. It could trigger patterns, maladaptive emotional responses in the client similar to how they might have been discriminated against elsewhere outside of the clinical relationship." Furthermore, Elizabeth addressed the theme of competencies by saying, "We talk about it the first day of class. It's in all of our syllabi…it's a standard part of all of our syllabi and the way I articulate it is we all must display certain competencies…It's about competencies …students who are unable to display these competencies…we as faculty are committed to work with them." Finally, Elizabeth discussed the theme of referral, stating that "A lot of it has been discussions around referrals and when referrals are appropriate and inappropriate." She acknowledged that she teaches her students that "…referring is based on clinical competency…clinical competence has to do with clinical issues…it does not have to do with multi-cultural groups…"

Summary of Elizabeth's Interview

The 13 themes (gate-keeping, parallel processes, fear of legal repercussions, due process, remediation, early warning signs, advising students to seek spiritual guidance, career fit, imposition of values, helping students explore their own values, harm to clients, competencies, and referral) that emerged from the data in the interview with Elizabeth provided insight into her perspective as a counselor educator who has had experience working with students unwilling to set aside their personal religious beliefs while counseling clients. Elizabeth, as a counselor educator new to the field, was able to offer a newcomer's insights into her experiences. Although Elizabeth acknowledged a bit of fear when she contemplates a lawsuit being brought against her if a student were to be removed from her program, she stressed the importance of not allowing that fear to be the basis of her decision making as she follows through on what she believes "to be fundamentally necessary and correct."

Carl

Carl is a 60-year-old Caucasian male who has been working as a counselor educator for six years. Prior to becoming a counselor educator he was a Lutheran minister. He currently serves on a state counselor licensing board. I found Carl to be very open to the interview process as demonstrated by his willingness to share intimate details of his own experiences in working with students who are unwilling to set aside their personal religious beliefs while counseling clients. Carl was able to offer his perspective as a counselor educator who also has served as a Lutheran minister. He appeared to be very passionate about his role as a counselor educator and explained his belief that it is inappropriate for counselors to force their own religious beliefs onto their clients.

Emerging Categories and Themes

Analysis of the transcripts of the interview with Carl produced 24 categories, derived from the perspective of a counselor educator who has also been a Lutheran minister. After reviewing the categories that emerged from Carl's interview, I began the process of clustering them into themes. The eight themes that emerged were harm to clients, imposition of values, helping students explore their own values, advising students to seek spiritual guidance, immersion experiences, gate-keeping, fear of legal repercussions and documentation.

The theme of harm to clients was addressed when Carl was asked if he could see any problems emerging from a counselor's unwillingness to set aside his or her own religious beliefs when counseling a client. He stated that "I could see clients shutting down, nobody wants to be preached at from whatever perspective you happen to be." He continued, "… I can see how you can turn…a potentially empowering counseling experience into a sick…experience real fast, and that's disgusting, that's abusive to poor clients and especially if you've done the bait and switch up front…, there's no fidelity in there at all."

Regarding the theme of harm to clients, Carl spoke at length, stating

…do no harm…well you just did, you shut 'em down they were about to share whatever, and you know even if it was from their own spiritual standpoint … do no harm…let 'em hammer it out a little bit and help them explore that in some detail…so your ethical principles can certainly come in there and your virtue ethics at that point, you know a lot of things can compromise them…It could be a horrible, horrible experience, especially

with some of the clients we see that may have cognitive disabilities, that are just ripe for

abuse anyway…

He also discussed the theme of imposing values, offering the comment that "…so in the

code I point out…you work within your client's value system…" He elaborated on the

imposition of values by saying,

That's disgusting and that's an abuse of any moral teacher or ethical teacher or religious

founder, whether it be Confucius, Jesus, Buddha…who knows who…that's disgusting …

and that's just used to your own selfish ambitions because you're not mature enough to

be honest with yourself that you really hate Hispanics…

He stressed the theme of helping students explore their own values, stating that he enjoys

"helping them…identify their core values, how they were formed, have they changed and then

applying those as counselors and being constantly in touch with one's core values." Carl

continued with, "…I want the counselor to be fully equipped with knowing their own values."

The theme of advising students to seek spiritual guidance emerged as Carl stressed that

he might say to a student "…have you thought about taking some consultation with those of

spiritual authority that you respect in your life?" Carl also explained the importance of

immersion experiences for students by stating,

We call them immersion experiences or cross cultural experiences where they are

required to fulfill certain field experiences with a variety of different kinds of people…

many times people have these attitudes because they are not aware of what people really

are…I think in counseling education we could wise up a little bit and intentionally have

those experiences even prior to the practicum or just say break the practicum into three

learning opportunities rather than one site…

The theme of gate-keeping was discussed in detail as Carl explained,

So the gate-keepers…as that role, that implies that we have a best practice format, part of

which must identify proper legal action that gives the student due process but also affirms

the validity of the eventual decision and that gets into record keeping, consultation…and

that's a big load put on a counselor educator's plate…and if they're not willing to deal

with it…they shouldn't have ever signed on for it.

Carl addressed the theme of fear of legal repercussions. When discussing terminating

students, Carl stated "I think there's a reluctance to do so for fear of, well it's gonna come back

on us…" When asked how concerned he would be as a counselor educator that legal action

would be taken against him or his department, if they dismissed a student for refusing to set aside

his or her religious beliefs while counseling clients, he responded, "Probably more so than if it

were an academic matter, those things are pretty cut and dry…"

Addressing the theme of documentation, Carl explained, "…we gotta leave a paper

trail…for legal purposes and professional purposes in being effective gate-keepers… it comes

back to establishing a factual track record."

Summary of Carl's Interview

During the interview with Carl, eight themes emerged including harm to clients,

imposition of values, helping students explore their own values, advising students to seek

spiritual guidance, immersion experiences, gate-keeping, fear of legal repercussions, and

documentation. Having been a Lutheran minister and a counselor educator, Carl was able to offer

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a perspective that reflected his experiences working in a setting where religious values are at the forefront of his role and in a position where counseling ethics are at the forefront of his role. Perhaps as a result of his experiences in these two roles, he focused much of his attention on his view that it was unethical and "disgusting" for counselors to impose their values onto their clients. He explained it was the counselor educator's responsibility to help students explore their core values during the training process.

Susan

Susan is a 39-year-old Caucasian female who has been a counselor educator for 11 years, is tenured, and has worked at four universities prior to assuming her current position at a private Jesuit Catholic university. She reported that her religious/spiritual background is "eclectic and somewhat non-relational" and stated that she is "very spiritual" but that she does not "espouse to a specific religion." Susan reported that she has had first-hand experience with working with students who refused to set aside their religious beliefs when they were counseling clients. In sharing her experience she stated:

> …my professional experience, I'm talking maybe two out of, I don't know, hundreds of students I've supervised…to me religious affiliation is another bias that you bring to the table …that you need to figure out how to bracket because it's not your job as a counselor to impose those views…

Emerging Categories and Themes

A review of the coded transcripts of the interviews conducted with Susan resulted in 29 categories. These categories reflected the perspective of a counselor educator currently working at a Jesuit University and who was sued during her very first year as a counselor educator.

Taking into account the setting in which she works and the fact that she has had previous experience with being sued, Susan was able to offer her perspective on working with students who are unwilling to set aside their religious beliefs while counseling clients.

After reviewing the categories that emerged from Susan's interview, I clustered them into themes. Each of these themes represents important concepts that were emphasized by Susan during the interview process. I took into account the emphasis that Susan placed on each category as well as the overarching themes that emerged. The nine themes from the interview with Susan were gate-keeping, harm to clients, imposition of values, helping students explore their own values, immersion experiences, remediation, fear of legal repercussions, documentation, and early intervention.

When asked how she would handle working with students who are unwilling to set aside their personal religious beliefs, Susan addressed the theme of gate-keeping and harm to clients. She responded, "…I move from the angle of gate-keeping… the undermining notion for me is that it is a gate-keeping issue because it's about competence and doing no harm to clients." She continued with,

> I feel like that's kind of where I go as a gate-keeper for the profession, because I firmly
>
> believe, and I don't think this is just in terms of religious beliefs, or Christianity or
>
> spirituality, but I think any counselor who has a rigid adherence to some kind of
>
> value…some kind of…perception of the way people should live could be damaging to
>
> clients...I think that can be counterproductive for the therapeutic relationship so I see it as
>
> a primary issue for me and it's something that… I think needs to be addressed in
>
> supervision.

Continuing with the theme of harm to clients, Susan explained "…even some adults who are in a very compromised position or they're very vulnerable, they can be very susceptible to suggestions to ways of thinking." She continued with,

> …a client…who suffers from really significant depression and who has a tremendous amount of guilt related to religion...I can see the potential of one of these counselors supporting that guilt rather than counteracting…

The theme of imposition of values was addressed by Susan when she explained,

> Your role as a counselor is not to create the ideal prototype person, your role as a counselor is to help each individual explore their own beliefs and their own values and how that fits in and is in alignment with how they're living."

She continued,

> I go back to …what's your role as a counselor? It's not to infuse your perceptions or beliefs …. It's to use your skill and your theory and your values to help them explore what's important to them …and focus on the client.

The third theme that emerged from the interview with Susan was helping students explore their own values. She explained,

> … it's not me coming in and immediately confronting, it's more of sort of like tell me what's going on with you, tell me what you believe, tell me what you think the roles of counselors are, how do you think your strong convictions to Christianity or religion fit into that and how can you use it and how can you at times suppress it because it's not something that is appropriate for the client at hand? You know, more of a teaching, sort of exploratory stance at the beginning…I found that to be incredibly productive and often

times these students have educated me a little bit about why they believe the way they do, because there's always a reason behind why they have a strong adherence to some kind of belief system like that, you know...so that's I think more of the approach I've found to be much more effective.

Susan also suggested that students may benefit from immersion experiences with various populations. She stated,

I think another piece is quite frankly exposing to differences because I've never seen someone who wasn't exposed to a population quite different than theirs that they didn't somehow find something on a common ground, or an appreciation for or an understanding about that person, so I think that's a piece of it too. I think we're charged to try to help these students and expand their views really.

The theme of remediation emerged, as well.

We've put students on remediation in my current university. We have a very thorough remediation process. We do have students who come in and they really believe that because it's a Jesuit Catholic university, for example…even their beliefs about birth control or something like that and one of the biggest things for us as faculty is we really try to head that off in the early techniques classes where we pull that person aside or we flag them as this person needs extra support. So then someone gets designated, a faculty member who's gonna actually work individually with that person to try to help them and again it's the same process regardless of what the issue might be, but it's all about this remediation plan. If an issue comes up the very first step for all faculty and affiliate faculty is to fill out one of these forms and write very specifically what the concerns are,

then meet with the student individually and explain that you're filling out this form, give

them a copy, let them share their side of the story. Then that all goes to a committee that

we have and then that original professor is kind of taken out of the loop of this

remediation committee that consists of a minimum of three other faculty and one

coordinator that does this all the time. …they gather all the data, of course, and they

interview both the professor and then they bring the student in and they discuss the

concerns and then they talk about a remediation plan which can be anything from… we

literally require all our students have to go through a minimum of 20 hours of therapy so

sometimes we require…we're lucky being a private Catholic school we can make other

requirements…that I've really never been able to do at other state universities but often

times that's the component of it we require people to go to their own therapy to explore

what's behind this and some of it also is we've had students who've had to take time off.

Susan also addressed the theme of fear of legal repercussions. She acknowledged that she

had "very little" fear of being sued and expounded by saying, "After being a professor for 12

years and I did get sued my very first year out and that was it and I also learned from that. Yeah,

definitely that fear has diminished the longer I'm a faculty member…" She addressed the

importance of documentation by explaining that,

We have a paper trail. We keep notes from all these separate meetings…, knowing we've

got all of that. Because I have been sued, I know if I do get sued that I have all the right

pieces in place to support myself. I guess that's maybe even some of it, not so much my

worry about 'oh my gosh I don't wanna get sued' but my confidence in… if it happens

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I'm prepared. And I've crossed my t's and dotted my i's and we're ready to go and we

have a system as a program in place to help us if something like that were to take place.

Finally, Susan addressed the importance of early intervention: "I think one of the biggest

things I learned from that is, is open-dialogue and the earlier in the program the better. From the

minute that these people come to even interview…" She also shared, "We actually have a pretty

thorough disclaimer that they sign during orientation as a part of the handbook where they take

an oath to not discriminate based on gender, sexuality, all those features."

Summary of Susan's Interview

Nine themes emerged from the interview with Susan: gate-keeping, harm to clients,

imposition of values, helping students explore their own values, immersion experiences,

remediation, fear of legal repercussions, documentation and early intervention. These themes

provided insight into Susan's perception of working with students who are unwilling to set aside

their personal religious beliefs while counseling clients. Susan currently works as a counselor

educator at a Jesuit University; thus, she was able to offer a perspective on working with students

whose religious beliefs might conflict with the values of counseling that is different from the

perspective of a counselor educator who works at a public university. Susan confirmed,

"From the minute that these people come to even interview…and I do get that more at [my

university] because of it being a … Jesuit Catholic program where that religion comes up right

away even with students. And it's more in the sense of their fear of am I gonna be forced to

follow all the Catholic doctrines."

Tina

Tina is a 50-year-old Caucasian female who has been a counselor educator for 20 years. She is tenured and has worked at four different universities. She was raised Jewish but states that most of her current spiritual practices are Buddhist based. When I asked her if she had ever worked with students who are unwilling to set aside their personal religious beliefs while counseling clients, Tina stated,

> You're using the term 'unwilling' to put aside…And I understand that, I think that I don't see it necessarily as unwilling…unless I know the student very well. I think that…my initial thing is that they're unable.

Emerging Categories and Themes

The interpretative process was used to create the categories which were then clustered to produce themes that represented important points from Tina's transcripts. A total of 24 categories emerged following the coding of the interview with Tina. These categories were then clustered into nine themes. In identifying the themes, I took into account all the background information provided to me by Tina, and the emphasis that Tina placed on each category as well as the overarching themes that emerged. The themes that emerged from the interview with Tina were helping students explore their own values, parallel processes, early intervention, immersion experiences, advising students to seek spiritual guidance, career fit, fear of legal repercussions, gate-keeping, and competencies.

The theme of helping students explore their own values was discussed by Tina as she explained,

We're hitting on such core values and probably some that are very deeply engrained. Sometimes with students who haven't really fully examined where their religious beliefs come from. Depending on where they are in their own spiritual development, they may be assuming a religious identity and haven't even questioned it yet."

Tina also stressed,

I've worked with some pretty young students. You know, they've gone straight through school—elementary, high school, right into undergraduate, right into a master's program, stayed in their own little world…and even have chosen to go to colleges that, that may not be very diverse…until they get to graduate school. And then for some students, they're getting to graduate school and it's really some of the first times that their core beliefs are being challenged—whether that's about racial stereotypes or about what's considered morally right or wrong behavior. And I wonder if sometimes we, with our clients, we take the time to conceptualize what's going on, and we don't expect them to change core beliefs overnight…but I think sometimes with students we may forget that.

The theme of parallel process emerged, as well. Tina pointed out, "so it sometimes makes me kind of ponder, how do I do this, how we perceive intolerance and then how we may match that with an equally intolerant stance? So, and I've caught myself doing that." Also, she noted,

So, how do we work effectively with somebody that we didn't think should be there? [It] was, was actually an interesting parallel process. Because, I mean think about it for a minute, we were being forced to work with somebody that we didn't want to work with.

The theme of early intervention emerged, as well when Tina explained, "I think that the earlier you start that, even in introducing, even in introductory classes, talking about this in

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techniques and role playing these kinds of situations from the baby skills class on. So it's not a, it doesn't come as a surprise later on." Tina stressed,

> …starting as early in the process as possible…I think it's our responsibility to set curriculum that faculty are looking for opportunities within the very foundational classes theories, skills, intro…classes, to start introducing those topics…

Tina demonstrated a conversation she might have with a student: "Now here are some challenges that I see for you coming down the road…how are you feeling about it, and let's touch base in another couple of months.

The theme of immersion experiences was evidenced when Tina shared one of her own experiences of requiring a student to participate in an immersion experience exercise. Tina explained, "The bottom line ended up to be, the student really was refusing to see anybody who said they were gay." She suggested the use of immersion experiences to help familiarize students with unfamiliar populations. Tina explained,

> We had a very strong GLBTQ center on campus…so we had her meet with some of the students at the center who had gone through the experience of being counseled and then being referred. And we said that she had to meet with them and just hear their side, hear how they reacted. Hear their feelings and reflect on it and write it, and at least give her the chance to empathize…

Tina reflected on the importance of having her students meet with their own spiritual advisors, as well: "…what I did with that student, and it was part of a remediation plan, was actually have her talk to her own minister about the compassion of her faith."

Tina stressed the theme of career fit, and described a situation in which a student "…was quote counseled out and she decided, interestingly, to go to a Christian based university that accepted a good portion of her credits." The theme of fear legal repercussions was evident when she stressed that,

I think that over the years, over the last number of years we've become a more litigious society. So, I think that…the fear of lawsuits not an irrational one. It's a huge amount; I mean talk to the people who were involved in either of these two cases…two recent cases. The amount of time, emotional energy, money, on the university's part, money on possibly your own part, depending on if you're being supported by your university or not…so I don't think it's an irrational fear; I do think it plays into some decisions.

Tina stressed the importance of her role as a gate-keeper when she explained,

I take that responsibility really seriously. It's part of my value. I approach that from a concept that it's not just gate-keeping in terms of it's my job to get somebody out, but more, I think about it as, that gate-keeping, ultimately as a win-win situation if I do [it] well.

She continued her discussion of gate-keeping, expressing the opinion that "We have a legal, not just ethical responsibility to endorse only those students for practice who we think are capable of working with whoever may walk in the door."

The theme of competencies also emerged from Tina. She suggested "You know, we have the ASERVIC competencies, we have the ALGBTIC competencies, the ACA multicultural competencies…" as she warned that, "…the student can be so overly focused on a sphere of the discussion, but they're just not connecting on any level with the client." She continued,

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…and again...that may not be part of the core issue… they get too caught up in this one issue that may or may not have anything to do with working effectively with the client.

Summary Tina's Interview

Nine themes emerged from the interview with Tina: helping students explore their own values, parallel processes, early intervention, immersion experiences, advising students to seek spiritual guidance, career fit, fear of legal repercussions, gate-keeping, and competencies. These themes provided insight into her perceptions of working with students who are unwilling to set aside their personal religious beliefs while counseling clients. Tina was a strong advocate for meeting students where they were in their developmental process. She discussed the parallel process that occurs when counselor educators are intolerant of students whom they perceive to be intolerant and she encouraged counselor educators to provide a supportive environment in which their students can grow.

Janet

Janet is a 34-year-old African American female currently on the tenure track at her university. She has been a counselor educator for nine years, has taught at three universities, and subscribes to the Baptist religion. She reported that she has had first-hand experience working with problematic students, "especially in the Bible belt." Even though many of her students are Baptist like she is, she reported that "I think that there's a difference in… a more conservative practice, I guess." She acknowledges that the population of students with whom she works is "very conservative."

Emerging Categories and Themes

The coded transcript of the interview with Janet produced 21 categories. The same

process used with the previous participants was utilized to analyze the data collected from Janet.

The categories provide insight into the perceptions of a counselor educator currently working in

what she identifies to be a conservative environment, who has had experience working with

students who are unwilling to set aside their personal religious beliefs while counseling clients.

The emphasis that Janet placed on each category as well as the overarching themes that emerged

produced six themes: imposition of values, gate-keeping, fear of legal repercussions,

documentation, early intervention, and referral.

Janet discussed the theme of imposition of values. She stated that the population of

students with whom she works holds conservative religious beliefs and that "They have a very

narrow view when you discuss religion as it relates to counseling." She explains,

> …we have to talk about how they see their specific religion fitting into the
>
> counseling…how would they deal with someone who has a difference in religion, and
>
> that ultimately amounts to a difference in belief systems…

She explained,

> I've had some students who…they've written in their journal…I believe in God, and I
>
> believe…God does such and such…they confuse that meeting the client where they're at
>
> …with religion.

Janet clarified, "…your job [as a counselor] is to be empathetic…and ultimately we teach

you to put your own values on the shelf." She continued, "I'm not asking you to abandon your

religious beliefs, I'm saying that if you can't put it on the shelf, then you may not be able to do this…."

Janet also discussed gate-keeping, "…I know that I, personally, can't OK the student when there's clearly an issue behind religion, or religiosity, not being able to embrace another person's religion." In discussing one of her experiences, Janet said, "I can't let her out of internship. I just personally cannot let her out of internship, so what are we gonna do about that?" She continued, "I ultimately did not sign off on the student's paperwork."

The theme of fear of legal repercussions emerged in the interview with Janet. She proclaimed, "I'm very concerned. It's why I keep up my license, and keep up my insurance and I tell my students to do the same. She continued, "…because, ultimately the university is not gonna protect me, it's gonna protect the university." She further explained,

> Ultimately, we as faculty members in the discipline of counselor education are really at
> high risk. And I think that more people are just not aware of it….I don't think that
> enough counselor educators are concerned about it.

Janet stressed the importance of documentation. "I keep notes on everything…I'm gonna write a memo on everything, because what if this comes back to me…" She stressed, "…it's about documenting everything…" and continued "…even though it's very time consuming and even though everybody else is looking at you like you're crazy." Additionally, in addressing the theme of early intervention, Janet said "I've proposed that there should be more testing at the front end, or more things set in place at the front end, so that if there is something we at least have…an inkling of it…"

The theme of referral was addressed by Janet when she stated that

> …we have to talk about how they see their specific religion fitting into the counseling and then how would they deal with someone who has a difference in religion, and that ultimately amounts to a difference in belief systems…and how do they do that?...they would just refer.

She then stressed, "You can't refer everybody."

Summary of Janet's Interview

Six themes emerged from the interview with Janet: imposition of values, gate-keeping, fear of legal repercussions, documentation, early intervention, and referral. These themes provided insight into her perception of working with students who are unwilling to set aside their personal religious beliefs while counseling clients. Janet offered her perspective, as someone who has been working as a counselor educator in a conservative environment in the Bible belt, on working with students whose religious beliefs might conflict with the values of counseling. Janet expressed that she was very concerned about the possibility of litigious action if a student were to be dismissed from the counseling program for refusing to set aside his or her religious beliefs while counseling clients.

Roger

Roger is a 51-year-old Caucasian male who has been working as a counselor educator for 20 years. He has worked at five universities and is not tenured. Although he was raised Catholic, he currently leans more towards a Unitarian and a Universalist spiritual perspective. During the interview, Roger discussed his experiences of working with students who are unwilling to set aside their personal religious beliefs while counseling clients.

Emerging Categories and Themes

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An interpretation of the transcripts of the interview with Roger resulted in 22 categories that emerged from the coded data. The clustering of categories produced seven themes. I took into account the emphasis that Roger placed on each category as well as the overarching themes that emerged. The seven themes included career fit, early intervention, gate-keeping, parallel processes, referral, helping students explore their own values, and fear of legal repercussions.

Roger discussed the theme of career fit when he stated,

… in the programs that I've led; my inclination is to be clear with the student about whether this is the right context for them to be training in…and that there are some contexts that would not only endorse, but support and nurture and water the particular ways in which they were conceptualizing client problems and their solutions."

Roger suggested the importance of early intervention. He stated,

I think that would be a part of our initial admissions conversation, in fact, I've been in programs where people who gave voice to positions that seemed odd, unduly, rigid, or overly sort of closed, we've brought them back for a second interview before we rendered an admissions decision..

When discussing early warning signs when working with students Roger said, "…my guess is that I would have had the willies early on." He explained that issues with students should be addressed "early and often."   Roger addressed the importance of gate-keeping:

I think that it would not be without some consideration that there are niche areas and clients where this person's skills could be of service. But I think in terms of trying to balance the greater sense of the profession, you know the larger sense of the profession, I know I have issues with it....endorsing them for the profession.

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He also discussed the concept of parallel process:

> I think, truthfully, that I'm aware that people can be as oppressive on the right as they can
>
> be on the left. I've certainly run into people who are domineering and overbearing and
>
> closed- minded about their own sort of liberal leanings as well, and I think I would be in
>
> a parallel dilemma if I had someone who was impervious to consider the presence of a
>
> spiritual life. So, to me those are ethical issues. How do we entertain the rights for
>
> everybody to have their own sense of values, beliefs and ideas…

The theme of referrals was addressed by Roger. He explained,

> …referrals are difficult; it takes great skill and fine relational art to make referrals go
>
> well, often times. So I think the matter of a client, it's one thing if the client is requesting
>
> a referral and coming to their own conclusion that this isn't the best fit and I'd like to
>
> work with another therapist versus my intervening as a supervisor and seeing a need for
>
> the counselor to initiate referral. I've heard people say, 'well I'll just refer it out' right? If
>
> I get a problem I don't like a case I don't like, a person I don't like, beliefs I don't like,
>
> whatever…I'll refer them out. But to me, that's bad professional form.

Roger stressed the theme of helping students explore their own values, "There are

learning opportunities on both sides. I think as counselor educators, trainers, supervisors…we

have that opportunity to…explore our own values and beliefs..." Roger continued,

> I think that part of our role as educators, at no matter what level it is, is to invite the
>
> student into a space where they can critically evaluate their own thinking and their own
>
> ideas and I think if a student is unwilling or incapable of doing that, then we have to have
>
> a different conversation.

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He continued, "I think there is a possibility that there could be a richness of exchange in sharing."

The theme of fear of legal repercussions emerged as well. Roger explained "I think of a quote by Carl Whittaker:

> 'If you don't feel some paranoia out there then you don't really know the score.' So there's a certain level that's normative. But whether that should ultimately rule the day for our decision making and sometimes interpersonal or inter- professional risk taking. I think we have to go there sometimes.

Summary of Roger's Interview

Seven themes emerged from the interview with Roger. These themes were career fit, early intervention, gate-keeping, parallel processes, referral, helping students explore their own values, and fear of legal repercussion. Roger emphasized the importance of helping students explore their own values. Furthermore, he stressed the importance catching potential problems early in a student's professional development and acknowledged that although he felt some concern of litigious repercussions, his bigger concern was whether or not he was going to let that concern interfere with his decision making process.

<div align="center">Cross-case Analysis of Participants' Themes</div>

Adhering to IPA, I completed each of the individual case interviews for all seven participants before attempting a cross-case analysis. Although IPA allows for flexibility in the cross-case analytical procedure, I decided to remain true to the initial intent of this approach and treat the participants as separate cases, and thus study them individually before attempting to answer my research questions (Smith, 2003). I believed this method would result in an

<div align="center">96</div>

interpretative process that minimized the potential for researcher bias and produce a more accurate account of the participants' perceptions of working with counseling students who are unwilling to set aside their religious beliefs while counseling clients. Smith (2003) recommended, "Once each transcript has been analyzed by the interpretive process, a final table of super-ordinate themes is constructed" (p. 74). He explained, "…deciding upon which themes to focus upon requires the analyst to prioritize the data" and that the analyst should include factors such as "…prevalence within the data" and "…the richness of particular passages" (p. 74). In keeping with the IPA process, themes that were addressed most often and emphasized the most strongly by the participants were clustered into super-ordinate themes.

For the seven participants, the cross-case analysis of participants' themes produced a total of 15 themes. Elizabeth's transcripts included 13 of the 15 themes, Susan's and Tina's transcripts each included 9 of the 15 themes, Mary's and Carl's transcripts each included eight themes, Roger's transcripts included seven themes, and Janet's transcripts included six themes (see Table 2). Across the 15 themes, three participants' transcripts included the theme of advising students to seek their own spiritual guidance, four participants' transcripts included the theme of career fit, three participants' transcripts included competencies, one participant's transcript include due process, four included documentation, five included early intervention, six included fear of legal repercussions, seven included gate-keeping, three included immersion experiences, three included parallel processes, three included remediation, three included referral, six included helping students explore their own values, five included imposition of values, and four included harm to clients.

Table 2

*Cross-Case Analysis of Seven Participants: List of 15 Themes*

Theme Names	Theme Total	Mary (8)	Elizabeth (13)	Carl (8)	Susan (9)	Tina (9)	Janet (6)	Roger (7)
Advising Student To Seek Spiritual Guidance	3		X	X		X		
Career Fit	4	X	X			X		X
Competencies	3	X	X			X		
Due Process	1		X					
Documentation	4	X		X	X		X	
Early Intervention	5		X		X	X	X	X
Fear of Legal Repercussions	6		X	X	X	X	X	X
Gate-keeping	7	X	X	X	X	X	X	X
Immersion Experiences	3			X	X	X		
Parallel Processes	3		X			X		X
Remediation	3	X	X		X			
Referral	3		X				X	X
Helping Students Explore Their Values	6	X	X	X	X	X		X
Imposition of Values	5	X	X	X	X		X	
Harm to Clients	4	X	X	X	X			

Super-Ordinate Themes

I compared each theme with all 15 themes and clustered similar themes into super-ordinate themes. One theme, gate-keeping, was the overarching viewpoint of all seven participants' interviews and represents all aspects of the 14 remaining themes. Three super-ordinate themes were created by clustering the 14 remaining themes: ethical issues, student interventions, and legal issues. The super-ordinate theme of ethical issues included client harm, imposition of values, referrals, and parallel process. The second super-ordinate theme of student interventions included early interventions, competencies, remediation, exploration of values, immersion experiences, seeking spiritual guidance, and career fit. The third super-ordinate theme, legal issues, included documentation, due process, and fear of legal repercussions (see Figure 2).

Figure 2

Counselor Educators' Perceptions of Working with Students Unwilling to Set Aside
Their Personal Religious Beliefs
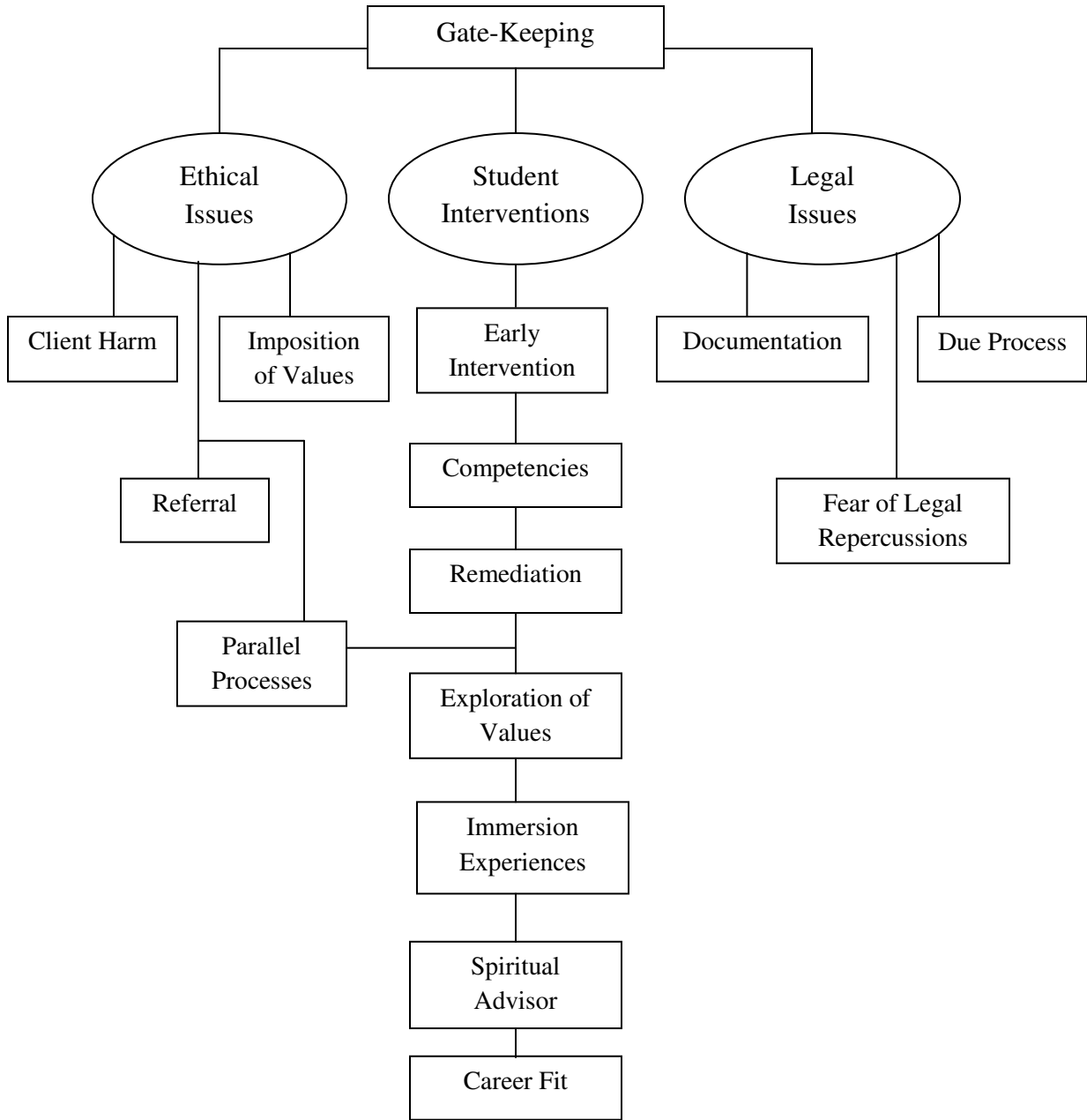
Gate-keeping

In the present study, gate-keeping was the one overarching viewpoint that emerged from the responses of all seven participants. Participants acknowledged that they considered gate-keeping to be a primary component of their role as counselor educators when making decisions regarding students who are unwilling to set aside their religious beliefs while counseling clients. Interview data supported the first secondary research question of how being a gate-keeper affects counselor educators' decision making processes. The seven counselor educators in this study reported that they take their role very seriously. They agreed that they would not endorse a student for graduation if they believed that a student was not adequately prepared to work with clients. For example, Elizabeth explained,

> I feel it [is] present with me at all times … in my classes when I'm grading papers…in reflection papers … if students have articulated difficulty working with different groups … there's always the thought for me that this could potentially lead to a remediation or gate-keeping issue ... for me gate-keeping really is fundamental for one purpose and that's protecting clients … and so that's the main perspective I have when I'm approaching these issues in class and in any type of conversation with students … whatever I'm experiencing now with the student in any way in the future going to endanger client welfare?

She also described,

> … when I'm ruminating over whether I need to be pursuing this further … it always starts with an evaluation and the student … it always starts there first before we end up in gate-keeping … but that's how you initiate gate-keeping procedures … so that's the main

thought I usually have … is this a situation where I need to complete our evaluation

which would initiate a review of the student? ... Is this a situation where I'm going to

need to initiate a review process which would necessitate me evaluating the student? ...

and then we would work toward remediation…which always could end up with the

student leaving the program…

Super-ordinate Theme 1: Ethical Issues

The super-ordinate theme of ethical issues supported the second and third research

questions. For both questions, what do counselor educators perceive to be the primary client

issues and what ethical issues are involved when students are unwilling to set aside their

religious beliefs while counseling clients, Mary, Elizabeth, Carl, Susan and Tina explained that

ethical concerns related to harming clients could include abandonment, imposition of values,

lack of respect, judging, persecution, discrimination and misconceptualization. The ethical

concerns of when students impose their values were addressed by Mary, Elizabeth, Carl, Susan

and Janet and referrals were addressed by Elizabeth, Janet, and Roger. Additionally, Elizabeth,

Tina and Roger addressed the idea that counselor educators should be aware that there may be

parallel process at work when they are resistant to working with students unwilling to set aside

their own personal religious beliefs.

Susan stressed,

The type of person who has these sort of rigid belief systems, typically there's a reason

behind it so I try to not go that route of legal and ethical, more of how can we make this a

learning experience and a growing experience…If it gets to a point though where the

person is just absolutely unwilling…and where values absolutely contradict with that

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person then that is something that I would have to address…for me it's an ethical

decision about difference of philosophy and when it's time to refer. One of my biggest

comments to students about their clients and themselves and their supervisors…is that

you don't need to like everyone. Not everyone is gonna have the same beliefs or values

or do things the same way you are…but it ultimately goes back to no harm.

Discussing ethical issues, Janet stressed,

…my issue has always been…you have taken an oath to uphold the code of ethics...The

ACA Code of Ethics—and that supersedes all this other stuff that you have going on. But

again, the code of ethics, it knows that there's this personal piece that's going on, which

is why we tell you to put it on the shelf…If you are saying that you're turning these

people away, you're saying you're not putting it on the shelf. I'm not asking you to

abandon your religious beliefs; I'm saying that if you can't put it on the shelf, then you

may not be able to do this…because there are many clients who come…that you won't

agree personally, with what their value system is or what they decide to do, but that's not

your job to judge what they're doing. Your job is to facilitate the process. How can I

help facilitate that process as long as you're not causing harm? Because again…I always

fall back on the Code of Ethics, what does the Code of Ethics tell you that you're

supposed to be doing?

Super-ordinate Theme 2: Student Interventions

The super-ordinate theme of student interventions addresses the fourth research question

that asked: as counselor educators at which point in a counseling student's training should

problematic areas be addressed and, how should these areas be addressed? The super-ordinate

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theme of student interventions included faculty early interventions with students based on competencies, remediation, values, immersion, spirituality and careers.

Elizabeth posed the question, "…what are the interventions that people are using?" before continuing with,

> …because there's nothing in the literature about that in general…far less specific to what interventions are appropriate for which student behaviors… and for this one my main thought would be increased supervision or maybe if it was supervision with a doctoral student to have a faculty member in there as well…depending on whatever the behavior was of the student…if there was risk of harm to clients whether they would need to be removed from practice…or depending on the time table, delayed from starting their practicum…referring, either requiring or recommending personal counseling and then definitely some type of self-reflective assignment…we typically have done papers where we would delineate very specific topics that the student would need to address in the paper…

The super-ordinate theme of student interventions is reflected in the words of Tina as she explained her follow up with students when she stated "… I think that the earlier you start…, even in introductory classes, talking about this in techniques…and role playing these kinds of situations from the baby skills class on… so it doesn't come as a surprise later on."
She also stated,

> … If they continue to refuse to work with clients, my response is 'I understand that you're not ready to work with this population…So, you're not ready. … it's our

responsibility to figure out how to [help you] be ready…so, what can we do to help you get ready?

Super-ordinate Theme 3: Legal Issues

The super-ordinate theme of legal issues covered the last research questions (5 and 6) that explored legal issues to be considered when working with students who are unwilling to set aside their religious beliefs and how the fear of legal actions affect counselor educators' decision making processes when working with these students. Elizabeth addressed the legal issue of due process and Mary, Carl, Susan, and Janet stressed the importance of documenting any concerning issues with students as soon as they emerge. The fear of legal repercussions was addressed by Elizabeth, Susan, Carl, Tina, Janet and Roger. The data showed that although these participants were cognizant of their own fear as it relates to having litigation brought against them, they would not allow that fear to deter them from doing what they considered to be personally and professionally ethical.

In discussing the super-ordinate theme of legal issues Carl explained, "…that's part of best practice as counselor educators…we preach decision making formats and utilization of legal resources to help in resolving certain matters that are not ethical but legal…" He stated,

> … as a counselor educator, we need to…be aware of when we are perhaps getting into legal issues…it doesn't mean that we need to be afraid of it, but it means if you don't know…law, you better go surround yourself with people that do…

He explained, "…I have to listen to what I tell my students and when these issues come up simply say 'perhaps we need to talk to the attorney on this one [on] how to deal with students who have this issue in an effective, ethical manner that is…legally precise…" He continued, "…and so perhaps the lawyer will say 'well this needs to be recorded in a file somewhere rather

than just chit-chat at the water cooler among faculty'…" Carl explained, "…we use attorneys at the state level on the committee all the time…" and then he posed the question, "…why bring em in if you're not gonna listen to em?" He stressed, "they help us make decisions…not ethical decisions…but legal matters, ethical matters that have legal ramifications…" Carl added

> …so counselor educators need to…feel that those supports are frankly available to them or we're not gonna act, we're going to sweep this under the table and hope [the students] have a wake up experience somewhere down the line before they hurt people…as a counselor…that's not acceptable…so the gate-keepers…as that role, that implies that we have a best practice format part of which must identify proper legal action that gives the student due process but also affirms the validity of the eventual decision and that gets into record keeping…

Tina explained,

> …ethics and law sometimes coincide and sometimes don't …from the legal perspective, I'm back to we have a legal, not just ethical responsibility to endorse only those students for practice who we think, are in fact, capable of working with whoever may walk in the door.

In a discussion on legal issues, Mary explained,

> …as with anything else we can ether can be reactive or proactive…remember we used to have standards of practice? You know ethical standards and mandates…well we took the mandates out and I think that any time we have case law that is gonna effect practice. It behooves us as an association and also as a training program to make sure that our students are prepared not to make the same errors…so I think it's, again…preparing our

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students…letting them know the cases...letting them know the outcomes of the cases and then as a profession if we have to go in and be more proactive in our guidelines or ethical guidelines then I think that would be good to do that…

Peer Review

Seven counselor educators were interviewed to determine the perceptions of counselor educators as they relate to working with students unwilling to set aside their personal religious beliefs while counseling clients. Interviews were recorded via digital recorder and transcribed verbatim. Each participant was then sent a copy of her or his transcribed interview for a member check to ensure accuracy. Once the participants approved the transcripts the transcribed interviews were then coded, codes were clustered into categories, categories were clustered into themes, and themes were clustered into super-ordinate themes. Super-ordinate themes were then used to answer the secondary research questions.

A fellow doctoral student who demonstrated his understanding of the research process and the coding method of qualitative analysis followed my coding and theme development starting with the transcriptions and ending with my findings. This peer reviewer was utilized to determine if the construction of categories and themes appeared accurate. The peer reviewer and I discussed the rationale for theme development and the peer reviewer posed questions to help draw my focus to the amount of attention each participant paid to a specific topic. This helped me to see the emergence of themes as they related to each individual participant. The peer reviewer recommended that I account not just for the words of the participants but for the emphasis they placed on certain responses.

Conclusion

In this chapter, a detailed description of the themes that were extrapolated from the individual interviews of the research participants was presented. A cross-case analysis of participant responses was conducted and the original themes were clustered into one overarching viewpoint, gate-keeping, and three super-ordinate themes: ethical issues, legal issues, and student interventions. The overall viewpoint of gate-keeping and the three super-ordinate themes were applied to the secondary research questions of this study.

CHAPTER FIVE

DISCUSSION

In this chapter, the purpose of the study is explained, and a summary of the procedures and results is provided. Findings are discussed and linked to previous research, and the limitations of the study are reviewed. In addition, implications for counselor educators are discussed as are recommendations for future research. The chapter concludes with a personal reflection.

Purpose

The purpose of this study was to explore counselor educators' perceptions as they relate to working with students who are unwilling to set aside their religious beliefs when counseling clients. A review of the literature revealed a general lack of research on this topic. The primary research question was: What are counselor educators' perceptions of working with students who are unwilling to set aside their personal religious beliefs when counseling clients? Specific research questions were:

1. According to counselor educators, how does being a gate-keeper affect their decision making process when working with students who are unwilling to set aside their religious beliefs while counseling clients?

2. What do counselor educators perceive to be the primary client issues that are involved when students are unwilling to set aside their religious beliefs while counseling clients?

3. According to counselor educators, what ethical issues must be considered when working with students who are unwilling to set aside their religious beliefs while counseling clients?

4. According to counselor educators, at which point or points in a counseling student's training (i.e., during admission standards, within the curriculum, or during the supervision process) should problematic areas be addressed? How should these areas be addressed?

5. According to counselor educators, what legal issues must be considered when working with students who are unwilling to set aside their religious beliefs while counseling clients?

6. How does the fear of legal actions affect counselor educators' decision making process when working with students who refuse to set aside their religious beliefs?

Summary of Methods and Findings

I utilized an Interpretive Phenomenological Analysis (IPA) approach to explore the lived experiences of counselor educators as they relate to working with students who are unwilling to set aside their religious beliefs when counseling clients. I used a small sample size and for the purpose of this study, no specific consideration was given to age, gender, or race of the participants. I interviewed seven participants, each of whom was working as a counselor educator at the time of the interview. Each participant had one or more years of experience as a professor of counseling and held a doctorate in counselor education or a related field.

I utilized purposeful criterion sampling for recruitment of participants. I requested from each member of my dissertation committee the name of a counselor educator working within a university setting whom he or she thought might be interested in participating in my study. From that list, participants were identified in a snowball procedure. Throughout the research process, I asked each participant to recommend a future participant who he or she might see as a potential

interviewee based on the criteria previously set. I continued to collect data until the point of saturation.

Data collection was accomplished through interviews with each participant. I conducted and transcribed all individual interviews. When reviewing the transcribed texts, I coded the raw data by using key words to identify emerging categories. Categories were clustered into themes and themes were clustered into super-ordinate themes which were then used to address the primary and secondary research questions. The results were organized into 15 separate but related themes. A cross-case analysis of participant responses was conducted and the original themes were clustered into one overarching viewpoint, gate-keeping, and three super-ordinate themes: ethical issues, legal issues, and student interventions.

Discussion

Smith (2003) suggested that, in the final section of an IPA study, the researcher might want to discuss super-ordinate themes while linking them to existing literature. Linking the super-ordinate themes used to answer the secondary research questions provides an overview of how these participants addressed the primary research question of "What are counselor educators' perceptions of working with students who are unwilling to set aside their personal religious beliefs when counseling clients?"

Ethics and Training Standards

As the participants addressed the issue of working with students unwilling to set aside their personal religious beliefs while counseling clients, they emphasized the importance of gate-keeping, which has both ethical and legal components and involves the implementation of student interventions. The ethical components of gate-keeping discussed by these participants

include the themes of harm to clients, imposition of values, parallel processes, and referral. Gate-keeping, as required by the ACA *Code of Ethics* and CACREP, ensures that students are informed of expectations, provides ongoing assessment, and includes remediation and student dismissal when remediation is unsuccessful. As gate-keepers to the profession, counselor educators have an ethical responsibility to ensure that students are not allowed to work with clients when the educators believe the students are unable or unwilling to provide competent, ethical treatment or that they might potentially harm the client.

These counselor educators reported that they have an ethical obligation to make students aware of the ethical standards of the counseling profession (ACA, 2005, F.6.d.). One such standard cautions counselors to avoid imposing their own values on their clients (A.4.b.). Furthermore, these counselor educators addressed the parallel process that might occur if counselor educators were to impose their values onto their students. Questions raised by one participant were "…am I being intolerant of what I perceive to be intolerant?" and "So, how do we work effectively with somebody that we didn't think should be there?...because, I mean think about it for a minute, we were being forced to work with somebody that we didn't want to work with." The ethical issue of referral was discussed by participants as they stressed that counselors cannot simply refer clients with whom they have value conflicts. As Elizabeth explained, "…referring is based on clinical competency" and "… referring simply based on group membership is discriminatory…"

The participants' responses regarding the legal aspects of gate-keeping were consistent with ethical standards as they discussed the themes of due process and documentation. When counseling students are unable to demonstrate a competent understanding of the curriculum

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being taught, the *ACA Code of Ethics* (2005) stresses that counselor educators must "…document their decision to dismiss or refer students for assistance, and ensure that students have recourse in a timely manner to address decisions to require them to seek assistance or to dismiss them and provide students with due process according to institutional policies and procedures" (ACA, 2005, F.9.b.). The themes of due process and documentation were linked to participants' acknowledgement that the fear of legal repercussions was sometimes present when they found themselves working with a problematic student.

Participants stressed the importance of early intervention and ensuring that students were adequately trained in the implementation of multicultural competencies. The theme of competencies presented by these participants is consistent with both CACREP and ACA requirements. The *ACA Code of Ethics* (2005) states, "counselor educators actively infuse multicultural/diversity competency in their training and supervision practices. They actively train students to gain awareness, knowledge, and skills in the competencies of multicultural practice" (F.11.c.).

The theme of remediation was addressed by participants. The *ACA Code of Ethics* does present the idea of remediation; however, counselor educators are struggling with the fact that clear procedures have yet to be developed. As Dufrene and Henderson (2009) explained, "Remediation is a fairly new process in supervision, with few documented resources for procedures and techniques that address both the supervisors' and the trainee's concerns" (p.156). The participants in this study addressed three possible remediation strategies that might be used when working with students who are unwilling to set aside their personal religious beliefs while counseling clients. The first of these interventions is an immersion experience in which students

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are immersed within a population in an attempt to familiarize them with the issues this population might be facing. The use of immersion experiences as a training exercise is consistent with the *ACA Code of Ethics* (2005) requirement that counselors are expected to "understand the diverse cultural backgrounds of the clients they serve" and to "explore their own cultural identities and how these affect their values and beliefs about the counseling process" (ACA, 2005, Introduction). The second suggestion for helping students struggling with values conflicts in the counseling setting involves counselor educators helping students to explore their own values. This, too, is consistent with the *ACA Code of Ethics* (2005) as counselors are instructed to be "…aware of their own values, attitudes, beliefs, and behaviors" and are encouraged to "avoid imposing values that are inconsistent with counseling goals" as they "respect the diversity of clients" (A.4.b.). The participants in this study suggested that students struggling with conflicts between their religious beliefs and the values of counseling might explore their values by consulting with a spiritual advisor.

When remediation is not effective with students unwilling to set aside their personal religious beliefs while counseling clients, these participants suggested that perhaps counseling was not an appropriate career fit. According to CACREP standards, "…program faculty conducts a systematic developmental assessment of each student's progress throughout the program, including consideration of the student's academic performance, professional development, and personal development." Furthermore, "Consistent with established institutional due process policy and the ACA *Code of Ethics* and other relevant codes of ethics and standards of practice, if evaluations indicate that a student is not appropriate for the program, faculty members help facilitate the student's transition out of the program" (2009, Section I.P.).

Relationship to Previous Research

In this section, I relate my research findings to previous research. In this section, five major issues addressed in Chapter 2 are discussed: gate-keeping, value conflicts, referrals, remediation, dismissal and due process.

Gate-keeping

In this study, gate-keeping was the one overarching topic that was emphasized in the responses of all seven participants. This was consistent with previous literature that has shown that counselor educators assume a gate-keeping role when working with students who are about to enter the field (Baldo et al., 1997; Bemak et al., 1999; Frame & Stevens-Smith, 1995; Kerl et al., 2002; Lamb et al., 1987, 1991; Lumadue & Duffey, 1999; McAdams et al., 2007; Wilkerson, 2006). Participant responses resulted in three super-ordinate themes that fell under the overall realm of gate-keeping: ethical issues, student interventions, and legal issues. The ethical issues discussed under the realm of gate-keeping were those that related to client harm, imposition of values, referrals, and parallel processes. The student interventions component of gate-keeping included early intervention, implementation of competencies, remediation, exploration of values, immersion experiences, consultation with spiritual advisors, and possible exploration of career fit. Legal issues discussed under the realm of gate-keeping included documentation, due process, and fear of legal repercussions.

Participants in this study acknowledged that they considered gate-keeping to be a primary component of their role as counselor educators when making decisions regarding students who are unwilling to set aside their religious beliefs while counseling clients. They agreed that they would not endorse a student for graduation if they believed that a student was not adequately

prepared to work with clients. As Mary explained, *"...*we really do look at it as, you can't endorse

them you don't graduate 'em." Roger said, when discussing his role as a gate-keeper working

with students unwilling to work with clients due to values conflicts, "I'd have an issue with

endorsing them for the profession." Elizabeth stressed the importance of gate-keeping, "I think

it's always an issue…it's so central to my experience. I feel it present with me at all times." She

explained that "for me, gate-keeping really is fundamental for one purpose and that's protecting

clients."

Value Conflicts

The super-ordinate theme of ethical issues that emerged from participant responses

included the theme of imposition of values. The counselor educators interviewed for this study

provided responses consistent with Corey (2008) who asserted, "Counseling and therapy are not

forms of indoctrination whereby practitioners persuade clients to act or feel in the right way"

(p.19). Corey further explained that, "…although counselors are taught not to let their values

show because doing so might bias the direction of therapy, we must recognize that counselors are

not neutral or value-free" (p.19). The participants in my study believed the imposition of values

to be unethical and that it could possibly lead to client harm.

The participants in this study suggested that training students in cultural competencies

was an important and necessary part of helping them to bracket their own biases. The

Association for Spiritual, Ethical, and Religious Values in Counseling (ASERVIC) has set forth

expected competencies for addressing spiritual and religious issues in counseling. Competencies

include categories relating to culture and worldview and counselor self-awareness. The

competencies demonstrate how a counselor's beliefs, values, attitudes, and assumptions should

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work within a client's worldview. Cashwell (2010) stated, "These competencies are included first to demonstrate that self-awareness, the person of the counselor, and a championing of diversity are all cornerstones of the ASERVIC approach to integrating spirituality and religion into the counseling process" (p.3). According to the most recently revised ASERVIC competencies (2010), counselors are expected to actively explore their own attitudes, beliefs and values about religion and spirituality and continually evaluate the influence of their own beliefs in the therapeutic relationship. Religious and spiritual values influence the practice of many counselors; however, counselors must not attempt to indoctrinate clients in a particular value system (Grimm, 1994).

Stressing the importance of training students in competencies, Mary said, "...it's so important that students are trained in the implementation of the competencies…I think throughout the curriculum there are appropriate courses where those competencies would fit in…" Janet stressed, "…if someone comes to you for help, and you're just saying…if you don't hold my religious beliefs, then I can't help you…that's discriminatory". Finally, Elizabeth reinforced the importance of having students become familiarized with multicultural competencies. She explained, "…we talk about it the first day of class. It's in all of our syllabi…it's a standard part of all of our syllabi and the way I articulate it is we all must display certain competencies." She stressed,

> …students who are unable to display these competencies…we as faculty are committed to work with them… it's not about getting rid of students…it's really about protecting client welfare and ensuring that our students have the necessary competencies to be successful when they graduate from our program…

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Referrals

One issue that emerged in response to the *Ward v. Wilbanks et al.* and *Keeton vs. Anderson-Wiley et al.* lawsuits was whether it is ethical to refer a client when there is a serious value clash between the counselor and the client. Some literature has suggested that referral may be a viable option when there are value clashes between a counselor and a client, but not when a counselor is unwilling to look at his or her part in the conflict (Corey, Corey & Callanan, 2011). A counselor cannot simply keep referring all clients who present the same problematic issue. If counselors recognize a pattern of frequent referrals, they might want to examine their reasons for doing so (Corey & Corey, 2007). The theme of referral, as discussed by the participants, fell under the super-ordinate theme of ethical issues. The participants stressed that it was unethical to simply refer a client based upon conflicting religious beliefs. As discussed earlier, participants recommended that students struggling with conflicting religious values might benefit from remediation and the continued exploration of their own values through immersion experiences and/or through the process of meeting with their own spiritual advisors during their training process.

The more specific issue of referral as an option in cases of conflicts between a counselor's religious beliefs and a client's sexual orientation is just beginning to be addressed in the literature. Recent literature by Granello and Young (2012) stressed that referring GLBT clients to another counselor because of a counselor's religious values "…is not sanctioned by the counseling profession and has practical as well as legal and ethical implications" (p. 391) and that it is illegal to refuse to work with clients based on their sexual orientation because it is discriminatory.

Three of the seven participants discussed the ethical issue of referral during their interviews. Their responses were consistent with the existing literature. Elizabeth stressed, "…referring is based on clinical competency… referring simply based on group membership is discriminatory." Janet stressed, "You can't refer everybody" and Roger explained, "…referrals are difficult, it takes great skill and fine relational art to make referrals go well." He continued,

I've heard people say, 'well I'll just refer it out right? If I get a problem I don't like, a case I don't like, a person I don't like, beliefs I don't like, whatever…I'll refer them out.' But to me, that's bad professional form…

Remediation

Although the majority of literature on gate-keeping has focused more on dismissal than on remediation, participants in this study addressed the topic of remediation as they discussed possible remediation strategies that might be beneficial when working with students unwilling to set aside their personal religious beliefs when counseling clients. Dufrene and Henderson (2009) explained, "Remediation is a fairly new process in supervision, with few documented resources for procedures and techniques that address both the supervisors' and the trainee's concerns" (p.156). The three possible remediation strategies posed by the participants include having a student explore his or her own values, the use of immersion experiences, and having a student consult with a spiritual advisor. These three possible remediation strategies could help counseling students become aware of their personal value systems and help them become more familiar with certain populations.

The three possible remediation strategies discussed by the participants are consistent with the ideas posed by Cashwell and Young. Cashwell and Young (2005) explained that some

counseling students who hold conservative religious values might be uncomfortable with

counseling lesbian, gay, bisexual or transexual (LGBT) clients because these sexual orientations

conflict with the students' religious beliefs about what constitutes an acceptable lifestyle. They

suggested that, during the training process, counseling students must become aware of

heterosexism and homophobia and that students should not be allowed to exempt themselves

from learning about this form of social oppression any more than they would be allowed to avoid

learning about the effects of racism.

Tina explained how having a student consult with a spiritual advisor could potentially

help a student struggling with a values conflict,

>…and so, the first thing I did was actually reinforce the student for being sensitive to the
>
>fact that she might be imposing her values…and what I did with that student, and it was
>
>part of a remediation plan, was actually have her talk to her own minister about the
>
>compassion of her faith…even though she disagreed with the behavior or the
>
>relationship…her job called for her to help this client… so we talked a lot about what
>
>made her want to become a counselor and she talked about that she was being
>
>called…so…I used her own spirituality with her, essentially…

Dismissal and Due Process

Although the theme of due process was discussed by only one participant, it was

discussed with such emphasis as to warrant attention. In my study, I situated the theme of due

process under the realm of legal issues. Elizabeth, the one participant who discussed due process,

stressed that she always considered it when working with students. Due process is a right

protected in the Fourteenth Amendment of the U.S. Constitution (Cobb,1994; Knoff & Prout,

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1985; Wayne, 2004). Denial of due process can be charged against institutions which receive federal or state funding (Gilfoyle, 2008). It can be claimed that previously admitted students have been denied the protected right to continue their enrollment (Frame & Stevens-Smith, 1995; Kerl et al., 2002).

Due process involves substantive due process and procedural due process. Substantive due process relates to depriving someone of their rights. For example, if enrollment is denied, the reasons must be legitimate and not arbitrary or capricious (Forrest et al., 1999; Gilfoyle, 2008; Kerl et al., 2002; Knoff & Prout, 1985; McAdams & Foster, 2007; Wayne, 2004). Procedural due process entails the actual steps taken to deprive someone of their rights. Elizabeth explained that as long as she knew that she had a valid foundation in due process when working with students facing remediation and dismissal, then she knew everything "…would probably be o.k."

Limitations

Because participants selected for this study are counselor educators, responses may be biased in ways that are reactive to the recent litigation. Additionally, findings may have limited generalizability; however, generalizability is not a goal of qualitative research. Although with IPA, data are gathered to the point of saturation, it is possible that a larger pool of participants could have led to an even deeper understanding of the phenomenon. Taking into account the subjective nature of IPA research, it should also be noted that the findings can be open to a variety of interpretations.

In an attempt to bracket my own biases, I assumed the role of the researcher and approached each participant with an exploratory stance, determined to understand their experiences without projecting my own biases or leading the interviews. I took on the role of a novice trying to understand a phenomenon as if I had no familiarity with it. During the

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interviews, I sometimes found myself thinking as a counselor educator and wanting to interject my experiences. However, knowing that my purpose was to gather research data allowed me to step back and really enjoy the exploratory nature of inquiry.

Implications

A review of the literature indicated that there was a general lack of research on counselor educators' perceptions of working with students unwilling to set aside their religious beliefs during counseling sessions with clients. This qualitative study provided insight into such perceptions. A better understanding of how counselor educators deal with students who refuse to set aside their personal religious beliefs when counseling clients can help the field of counselor education create more effective means of addressing these types of situations in the academic setting. Understanding the perceptions of counselor educators in the field can lead to studies that may improve gate-keeping and remediation strategies for students failing to meet the basic criteria of their programs.

Implications for Counselor Educators

As evidenced by *Ward v. Wilbanks et al.* and *Keeton vs. Anderson-Wiley et al.*, counselor educators are finding themselves faced with the possibility of having to work with students who refuse to set aside their personal religious beliefs when counseling clients. Research on counselor educators' perceptions of working with such students can have a positive impact on the profession, as it provides insight into the types of problems that counselor educators often find themselves facing as well as ways to address such issues. Knowing what remediation strategies have been employed in the past as well as their effectiveness can benefit counselor educators seeking ways to assist students struggling with setting aside their religious value systems while counseling. This research confirms that religious values conflicts such as those represented by

the recent legal cases are not isolated incidents and that they are occurring in other counselor education programs. Counselor educators can benefit from having a specific set of interventions to use. Having access to specific, uniform interventions that are pre-approved and tested by their departments could help provide consistency in dealing with such situations.

Furthermore, this research underscores some very important aspects of counselor education that counseling professionals must constantly consider. In all situations, legal and ethical components must be considered. When teaching students, counselor educators must be aware of which student interventions are appropriate and for which situations. They must also know when certain scenarios become more than routine teaching situations and require deeper levels of intervention through remediation.

Additionally, as this research demonstrates, counselor educators must maintain an awareness of their own biases and possible parallel processes that may occur when required to work with students with whom they may not personally want to work. Results of this study serve as a reminder that just as counseling students are learning, so too are counselor educators and that above all, client welfare is of the utmost importance regardless of one's personal values.

Implications for Counselor Education Programs

The findings of this study contribute to an understanding of the frequency with which counselor educators find themselves having to implement interventions with students unwilling to set aside their personal religious beliefs. This research, along with future research will provide a framework to train counselor educators facing such situations. A better understanding of this phenomenon can help to expedite the formulation of intervention strategies that are effective as well as legally and ethically sound. This research could possibly lead to further research that

helps create consistency in the ways departments handle working with students struggling to set aside their personal religious beliefs. With the creation and implementation of concrete strategies that are both legally and ethically sound for handling such situations, the field of counselor education may be better equipped for possible future lawsuits revolving around these scenarios.

Recommendations for Future Research

The field of counselor education could benefit from future studies that assess remediation strategies aimed specifically towards assisting students struggling to set aside their religious beliefs when counseling clients. Studies exploring the parallel processes that occur in these situations might possibly lead to more effective teaching strategies. Further research could also lead to a dialogue that normalizes this experience for counselor educators. The development of remediation strategies can lead to more efficient documentation on the part of counselor educators as well as support the overall gate-keeping philosophy of the profession. Furthermore, future studies might examine the role that fear plays in a counselor educator's decision making process when working with problematic students, and long-term studies could assess if the implementation of remediation strategies helps ease this fear and perhaps educators' level of effectiveness in helping students. Other studies could assess the effectiveness of specific remediation strategies such as immersion experiences.

Future studies might explore this phenomenon from the student's perspective, giving voice to those who, themselves, may have been dismissed or remediated. Studies that explore interventions students believed were effective in facilitating their professional development might provide insight into their receptivity to interventions. Quantitative studies might be conducted to determine the effectiveness of certain remediation strategies as well as measure whether certain interventions are more successful alone or in conjunction with others. Although

this qualitative study provided insight into the perceptions of counselor educators when working with students who are unwilling to set aside their personal religious beliefs, quantitative studies are needed to provide data regarding the prevalence of these types of situations, as well as testable and measurable ways of handling them.

Personal Reflection

Reflecting on my experience as a researcher, I was honored to have had the opportunity to interview and hear the stories of the participants. I had the utmost respect for each of the participants and thoroughly enjoyed hearing about their experiences in the counselor education field. My responsibility as a researcher was to remain as unbiased as possible as I adhered to the established procedures for collecting and interpreting data. Throughout every stage of this study, I made every effort to conduct myself in an ethical and professional manner. Having been trained as a counselor educator, myself, I viewed the entire research process as a learning experience. Specifically, reading and rereading the transcribed words of the participants gave me an added perspective about what it's like to be a counselor educator currently working in the field. Throughout the research process I was challenged to maintain objectivity when reading participant statements but found the entire experience rewarding and educational. I believe each participant brought a unique perspective while demonstrating a deep passion for the field. It was my impression that all of my participants appeared genuinely open about sharing their experiences and I believe they did so to benefit the counseling profession.

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Wilkerson, K. (2006). Impaired students: Applying the therapeutic process model to graduate training programs. *Counselor Education & Supervision, 45*, 207-217.

Woodyard, C., & Canada, R. (1992). Guidelines for screening counselors in training. *TACD Journal, 20*(1), 11-19.

How long have you been a counselor educator?

Are you tenured or non-tenured?

Gender:

Age range:

Ethnicity:

How many Universities have you worked as a counselor educator prior to your current position?

What religious/spiritual background (if any) do you subscribe to?

Have you had any first-hand experience working with professionally challenged (problematic) students, in general? If so, can you please elaborate?

Have you had any first-hand experience working with students unwilling to set aside their religious beliefs when working with clients? If so, can you please elaborate?

Do you personally know of any counselor educators who may have had firsthand experience with working with students unwilling to set aside their religious belief? If so, can you please elaborate?

Has your department, to your knowledge, ever expelled anyone from its program based upon a breach of ethics? If so, can you please elaborate?

How does your program deal with students who are experiencing challenges?

Does your program readily institute the use of remediation plans when working with students who are not adhering to policies and procedures or who have demonstrated some deficiency in their training? If so, can you please elaborate?

To your knowledge, has your department ever had a student bring a law suit against it claiming discrimination based upon religious beliefs? If so, can you please elaborate?

How does being a gate-keeper affect your decision making process when working with students who are unwilling to set aside their religious beliefs while counseling clients?

What do you consider to be the primary client issues that are involved when students are unwilling to set aside their religious beliefs while counseling clients?

In your opinion, where does the responsibility lie in assuring that students are appropriately trained before they are allowed into the field? Should the issues be addressed under the category of admission standards, within the curriculum, or during the supervision process?

What legal issues must be considered when working with students who are unwilling to set aside their religious beliefs while counseling clients?

How concerned are you that students may bring legal action against your counseling programs if they were dismissed for refusing to set aside their religious beliefs?

What are your opinions about referring clients when there is a value conflict between the client and the counselor?

Date:
Participant Name:
Address of Participant:

Dear (Participant's Name),

I am a graduate student under the direction of Dr. Barbara Herlihy in the Department of Educational Leadership, Counseling, and Development in the College of Education at the University of New Orleans.

I am conducting a qualitative dissertation study on *counselor educator's' experiences of working with counseling students unwilling to set aside their personal religious beliefs.* I am requesting your participation because your name was provided through a snowball sampling technique as a potential participant currently working in the field of counselor education, having at least one or more years of experience and who might be interested in sharing your experiences as they relate to working with counseling students.

Your participation in this study has the potential to assist in further understanding how counselor educators feel about working with students unwilling to set aside their religious beliefs when counseling clients. This study has been approved by the Institutional Review Board at the University of New Orleans. All information that you provide is anonymous; there will be no way to identify you. The results of the study may be published but your name will not be known. Although there may be no direct benefit to you, the possible benefit of your participation will contribute in assisting counselor educators in understanding the experiences of counselor educators as they pertain to working with students unwilling to set aside their religious beliefs when counseling clients.Your participation will involve an interview, conducted by myself as the researcher. All responses to the interview will be transcribed verbatim, coded and analyzed and may be reviewed by a confidential peer reviewer.. No identifying information will be included in the results and there will be no risk of harm to participants.

 I will be contacting you via telephone within seven days of this email being sent to ask if you are willing to participate. If you are willing to assist me with this important part of my study, please respond to this email at msaussay@uno.edu.

Your participation in this study is voluntary. If you choose not to participate or to withdraw from the study at any time, there will be no penalty. Please contact Dr. Barbara Herlihy (bherlihy@uno.edu) at the University of New Orleans for answers to questions about this research, your rights as a human subject, and your concerns regarding a research-related injury.

If you have any questions concerning the research study, please contact me at msaussay@uno.edu. You may also contact my faculty advisor, Dr. Barbara Herlihy, by email at bherlihy@uno.edu or by telephone at (504) _____.

Thank you for your consideration and participation.
Sincerely,
Michael G. Saussaye MA,MHS, CRC,LPC
Doctoral Candidate
University of New Orleans

Appendix C
Confidentiality Form For Peer Reviewer

Persons assisting the researcher should complete this document.
If the study includes sensitive information, the researcher also must sign this form.

Counselor Educator's Perceptions of Working With Students Unwilling To Set Aside
Their Personal Religious Beliefs When Counseling Clients

CONFIDENTIALITY STATEMENT

As a researcher working on the above research study at the University of New Orleans,

I understand that I must maintain the confidentiality of all information concerning

research participants. This information includes, but is not limited to, all identifying

information and research data of participants and all information accruing from any

direct or indirect contact I may have with said participants. In order to maintain

confidentiality, I hereby agree to refrain from discussing or disclosing any information

regarding research participants, including information described without identifying

information, to any individual who is not part of the above research study and in need of

the information for the expressed purposes on the research program.

_____   _____   _____
Research Assistant Signature   Printed Name   Date

_____   _____   _____
Principal Investigator Signature   Printed Name   Date

_____   _____   _____
Signature of Witness   Printed Name   Date
                        Appendix D

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University Committee for the Protection
of Human Subjects in Research
University of New Orleans

_____

Campus Correspondence

Principal Investigator: Barbara J. Herlihy

Co-Investigator: Michael G. Saussaye

Date: May 23, 2011

Protocol Title: "Counselors Educators' Perceptions of Students who are
                                 Unwilling to set aside their Religious Beliefs when
                                 Counseling Clients: A Qualitative Study"

IRB#:   06May11

The IRB has deemed that the research and procedures described in this protocol
application are exempt from federal regulations under 45 CFR 46.101category 2, due to
the fact that any disclosure of the human subjects' responses outside the research would
not reasonably place the subjects at risk of criminal or civil liability or be damaging to the
subjects' financial standing, employability, or reputation.

Exempt protocols do not have an expiration date; however, if there are any changes
made to this protocol that may cause it to be no longer exempt from CFR 46, the IRB
requires another standard application from the investigator(s) which should provide the
same information that is in this application with changes that may have changed the
exempt status.

If an adverse, unforeseen event occurs (e.g., physical, social, or emotional harm), you
are required to inform the IRB as soon as possible after the event.

Best wishes on your project.
Sincerely,

Robert D. Laird, Ph.D., Chair
UNO Committee for the Protection of Human Subjects in Research

VITA

Michael G. Saussaye was born in Metairie, Louisiana. He obtained a bachelor's degree in sociology from Louisiana State University in 1999. He obtained his first master's degree in criminology from Louisiana State University in 2004 and his second master's degree in rehabilitation counseling from The Louisiana Health Sciences Center school of Allied Health in 2006. In 2007 he joined the University of New Orleans graduate program to pursue a PhD in counselor education. He is currently a Licensed Professional Counselor Supervisor (LPC-S) and a Certified Rehabilitation Counselor (CRC) in the state of Louisiana.