Journal of Counselor Practice, 16(1):23–50, 2025
DOI: 10.22229/alt9031203

Practices for Ethical Gatekeeping in a University Setting

Amanda Elise Dossaji [1]
University of the Cumberlands

Daniel Ullrich
University of the Cumberlands

Shay Carper
University of the Cumberlands

Tonda Shine
University of Cumberlands

Alison Squire-Anderson
University of the Cumberlands

Kelly Couture
University of the Cumberlands

Kathleen Palmer
University of the Cumberlands

Gatekeeping in counseling master's programs is crucial for maintaining professional standards and ensuring that students meet competency requirements throughout training. All programs experience problems of professional competency (PPC) with some students, which can significantly impact the parties involved. In this article we explore the complexities and challenges of gatekeeping and remediation through the case study of Fred, a counseling student exhibiting PPC in his practicum. We analyze Fred's ethical violations and needed areas of remediation. We elaborate on distinct challenges in virtual programs followed by possible pitfalls to the gatekeeping and remediation process. Program faculty must navigate these challenges to ensure the development of strong counselors and protect all stakeholders involved.

Keywords: gatekeeping, remediation, professional competence, counseling training, PPC, student impairment, ethics

[1] Correspondence may be sent to Dr. Amanda Elise Dossaji (Email: amanda.dossaji@ucumberlands.edu)

Gatekeeping in professional counseling training programs is an essential yet challenging requirement. Gatekeeping begins with a prospective student's first contact with the university and continues through graduation. Throughout this time, universities are responsible for being transparent about competency expectations and monitoring for problems of professional competence (American Counseling Association [ACA], 2014, Standards F.9.a, F.9.b).

The ACA *Code of Ethics* (2014) states that *impairment* is a notable deficit in one's ability to effectively function professionally. However, the Americans with Disabilities Act Amendment Act (2008) indicates that the word *impairment* is a legal term and due to a potential for misunderstandings, another term not associated with a legal application was necessary. The new term had to focus on performance and professional behavior; therefore, Elman and Forrest (2007) coined the term *problems of professional competency* or *PPC* for clarification. PPC is indeed a broad construct encompassing a range of behaviors and characteristics that interfere with a counselor-in-training's ability to meet professional standards (Elman & Forrest, 2007). However, counselor educators distinguish PPC from purely personal or psychological issues by focusing on how such difficulties manifest in professional and academic performance (Brown-Rice & Furr, 2016; Jacobs et al., 2011). PPC reflects observable deficiencies in professional dispositions such as ethical judgment, emotional regulation, and interpersonal functioning that compromise a student's competence to practice safely and effectively (Homrich et al., 2014; Rust et al., 2013). Thus, while personal challenges may contribute to PPC, the gatekeeping process emphasizes behaviors and competencies

directly related to ethical and professional functioning rather than private or clinical concerns.

PPC includes a variety of manifestations and exists in some form in every training program. The most frequently reported types of PPC involve deficiencies such as poor academic performance, counselor/student difficulties with affective regulation, and lack of a professional disposition with others (Jorgensen et al., 2017). These deficits may be noticed not only by counselor educators but also by supervisors and peers (Brown-Rice & Furr, 2013); and when these skills and/or professional demeanor are lacking, the responsibility of gatekeeping falls on counselor educators. Therefore, monitoring is essential and can be used as a stop-gap measure to decrease the risk of ill-prepared and/or ill-suited counselors from actively entering and practicing in the field (Brown-Rice & Furr, 2016).

From an analysis of several studies about gatekeeping across social sciences professions, Brear et al. (2008) estimated that annual student impairment ranges from 4.6% to 10.4% of students or 2.5 students per program within a five-year period. Brear et al. further identified that most students (85-95%) indicated that at least one of their peers in training was experiencing PPC, which translates to a possible higher prevalence in the 12% to 21% range. With PPC present in every training program, institutions must be cognizant of what it is and how it manifests. The purpose of this conceptual article is to discuss and practically apply ethical gatekeeping practices in relation to PPC.

Manifestation and Impact of PPC

PPC manifests in a variety of ways. In a study of students identifying peers with PPC in Counsel for Accreditation of Counseling and Related Educational Programs

(CACREP) accredited programs, Brown-Rice and Furr (2013) found the most significant PPC included difficulty regulating emotions, inadequate academic skills, psychological unsuitability, inadequate clinical skills, unprofessional behaviors, poor moral character, ethical violations, and personality disorders. Additional PPC identified were racism, multicultural insensitivity, substance use issues, low self-awareness, immaturity, unkindness, and forcing religious beliefs. In another study by Brown-Rice and Furr (2016), faculty in CACREP-accredited programs reported the most frequently identified PPC were inadequate interpersonal skills, inadequate academic skills, inability to regulate emotions, and unprofessional behavior. PPC that were ranked less significant were unprofessional behavior, unethical behavior, psychological concerns, personality disorders, and substance use disorders.

Other issues that may not be readily apparent but may constitute PPC include low self-esteem, difficulty accepting personal responsibility, or a poor attitude toward the counseling field (Foster et al., 2014). When students exhibit these various forms of PPC, it can adversely impact proficient students and can impact faculty who must address the students dealing with PPC (Rose & Persutte-Manning, 2020). Although faculty can take action to address the PPC, it requires time, which can reduce their availability to support proficient students (Rose & Persutte-Manning, 2020). In addition to the time required to help address PPC, various difficulties can cause challenges for university training programs. Challenges may arise related to program factors, the complexity of addressing PPC, and the impact on faculty and staff of addressing PPC.

Challenges to Gatekeeping

Program Factors

Several program factors may influence or detract from faculty addressing PPC, including accreditation status, perceived institutional support, full-time to adjunct faculty ratios, program delivery method, and the presence or lack of well-developed gatekeeping procedures (Gaubatz & Vera, 2002). Gaubatz and Vera (2002) found that CACREP-accredited programs reported higher remediation and dismissal levels of students with PPC than non-CACREP-accredited programs. Furthermore, the authors also found higher rates of unremediated students in programs whose faculty perceived higher institutional pressure to avoid addressing students with possible PPC.

Faculty tenure status may impact the gatekeeping process, in that tenure-track faculty generally interact more with students than adjunct faculty, possibly making it more challenging for adjunct faculty to identify and address PPC (Gaubatz & Vera, 2002). Also, untenured faculty may have a disincentive to gatekeep due to possibly receiving lower evaluations or fears of being the subject of legal action (Gaubatz & Vera, 2002). As a result, programs with higher rates of tenured faculty may have greater opportunities to identify PPC and less pressure from potential negative repercussions that may result when addressing PPC.

The program delivery method can influence the gatekeeping process given the variety of options for program formats. Online or hybrid programs can have the added challenge of identifying PPC issues in a virtual environment (Haddock et al., 2020). The natural interactions and array of nonverbal communication that is evident in traditional teaching formats may not be as readily present in virtual settings. As a result, online or

hybrid programs have the additional responsibility of enhancing communication with students around professional competency and the gatekeeping process (Haddock et al., 2020).

The presence or lack of clear gatekeeping procedures may also influence faculty's ability to engage in gatekeeping around PPC (Jacobs et al., 2011). A significant aspect of this issue centers around key determinants of student PPC: intrapersonal and interpersonal functioning (Brear et al., 2008). Defining the specific criteria for interpersonal and intrapersonal functioning necessary to establish professional competence helps position gatekeepers to be able to better execute their responsibilities. Additional elements of professional competency may include a student's professionalism, counseling skills, and documentation of clinical work (Dufrene & Henderson, 2009). Alternatively, when a program lacks clarity in defining these areas of functioning and how to assess them, it undermines counselor educators' ability to execute gatekeeping related to these areas (Brear et al., 2008; Vacha-Haase et al., 2004).

When professional competency determinants are clearly established, they provide a guide for decision-making throughout the entire educational process. This includes establishing standards of professional competency that are clear from the outset, communicated to prospective, new, and ongoing students in the program, and guiding the evaluative process (Brown-Rice & Furr, 2016; Homrich et al., 2014). Having clarity in these areas is instrumental across all gatekeeping scenarios, especially when they become complex.

Complexity

Several varying factors can contribute to the complexity of the gatekeeping process. Some examples include different safety priorities, multiculturalism, the rights of all parties involved, potential errors in gatekeeping, subjectivity in assessment, and confusion about regulations. When some or all these factors combine, it can create a complex and challenging gatekeeping process for faculty. There is a need for multicultural competency in gatekeeping amongst faculty. Faculty may not have adequate multicultural awareness informing student competency assessments. For example, faculty cultural biases or students with cultural norms outside those of the faculty can cause faculty to mislabel a student as having PPC (Rose & Persutte-Manning, 2020; Rust et al., 2013).

Universities also must contend with the subjective nature of the circumstances that indicate the existence of PPC and the need for related remediation (Dufrene & Henderson, 2009). Faculty and staff must consider the presence or influence of a disability and related accommodations and how the Americans with Disabilities Act (1990) influences the student's rights and performance. To facilitate multicultural competency and minimize the potential to mislabel students as having PPC, universities may require additional time, consultation, and attention from faculty (Rose & Persutte-Manning, 2020). In this process, faculty and staff must navigate student, institutional, and client rights simultaneously (Gaubatz & Vera, 2002). Decisions must be nondiscriminatory and legal, reflecting best practices in higher education (Eells & Rockland-Miller, 2010). This challenge is illustrated with how faculty and staff must

balance factors influencing the safety of the community at large and the individual student (Eells & Rockland-Miller, 2010).

Faculty may have difficulty understanding student competency level or disagree about the nature or presence of a student's PPC, making effective evaluations of student competence complex and challenging (Gizara & Forrest, 2004; Jacobs et al., 2011; Rapp et al., 2018). When there is clarity around the presenting PPC, faculty may have limited competency to have effective conversations with the student about the PPC or have fear of negative reactions if they do (Jacobs et al., 2011). In addition to the ACA *Code of Ethics* (2014), multicultural competency is a necessary aspect of making sound gatekeeping decisions (Rapp et al., 2018). Fear of a mistake in any area of this process can cause faculty concern for how this may impact them personally. The combination of these sometimes-conflicting priorities can contribute to the potential for error in following gatekeeping protocols (Rapp et al., 2018).

Impact on Faculty and Staff

In addition to the complexity surrounding PPC, faculty members' potential mistakes and related reprisals can cause emotionally intense experiences that can be persistent and draining, having a professional and personal impact (DeCino et al., 2020). This may lead to distressing feelings of dissonance, discomfort, guilt, anger, and role confusion along with more positive feelings such as empathy, compassion, and sensitivity for students (DeCino et al., 2020; Wissel, 2014). Furthermore, the fear of being the subject of legal action can factor into the gatekeeping process (Gaubatz & Vera, 2002).

The process can be a difficult and heavy responsibility for lasting years, including a decade or more, when dealing with academic appeals and related legal proceedings

(DeCino et al., 2020; Wissel, 2014). When proceeding with the gatekeeping process, several actions are required. Some components include initial information gathering, meetings, communication with relevant parties, and enforcing remediation by establishing, executing, and evaluating progress with the plan. Working through these steps requires a commitment of time that can detract from other responsibilities (Rose & Persutte-Manning, 2020; Vacha-Haase et al., 2019). Increased demands on faculty time can also result from requiring students to participate in increased supervision, course repetition, and additional coursework, among other requirements (Rose & Persutte-Manning, 2020).

Navigating Challenges and Making Ethical Decisions

Given the potential program factors, complexity, and impact on faculty and staff, gatekeeping can be a formidable undertaking. Having ways to help work through these complexities and to provide clarity on how to appropriately proceed can help make the process more manageable. From this perspective, ethical standards offer a central organizing principle for navigating gatekeeping challenges and guiding the decision-making process. Ethics provides a compass for determining issues of PPC, balancing safety priorities, protecting from liabilities, and resolving potential subjectivity. Prior research supports the use of ethical frameworks in guiding faculty through complex gatekeeping processes (Homrich et al., 2014; Rust et al., 2013).

Remediation as a Function of Gatekeeping for Counselor Educators

According to Bernard and Goodyear (2019, p. 241) and Shen-Miller et al. (2015), remediation is crucial for students who struggle with professional competence in various contexts. The ACA *Code of Ethics* (ACA, 2014) and the CACREP (2016) standards

provide procedural and general information to assist with student assessment and support during remediation. Without precise implementation standards, counselor educators must rely on institutional regulations that may not support their decision-making, and subjective practices are vulnerable to legal challenges.

According to the 2016 standards set by CACREP, counselor training programs consider dispositional evaluations crucial. Remediation committees, consisting of counseling professionals and leadership, utilize systematic methods to tackle dispositional difficulties based on abstract and challenging-to-define evaluations of student attributes (Eells & Rockland-Miller, 2010; Homrich, 2009). Nevertheless, counseling lacks universally accepted dispositional abilities, as Homrich et al. (2014) and Rapp et al. (2018) noted. Consequently, programs must develop and execute essential behavioral aspects in their counseling programs and determine robust evaluation methods (Haddock et al., 2020). The ACA *Code of Ethics* (2014) further elaborates on this requirement.

Section F.6.b of the ACA *Code of Ethics* (2014) pertains specifically to gatekeeping and remediation. Additionally, the 2016 CACREP Standards mandate that counselor preparation programs establish a policy for student retention, remediation, and dismissal that aligns with the due process policies of the institution and the ethical codes and standards of the counseling profession (2016, Section 1.O.). Section F.6.b of the ACA *Code of Ethics* (2014) pertains specifically to gatekeeping and remediation. Additionally, the 2016 CACREP Standards mandate that programs establish a policy for student retention, remediation, and dismissal that aligns with the due process policies of the institution and the ethical codes and standards of the counseling profession (2016,

Section 1.O.). The following vignette illustrates a case of a student with various PPC and how the ACA *Code of Ethics* (2014) can guide the gatekeeping process.

Gatekeeping Process

Vignette

Fred is a 43-year-old African American male at an online M.S. of Counseling program. The professor for Fred's practicum course has recently found out that Fred is misrepresenting himself online at his practicum site. The student's practicum site is a private practice. Another student in the same practicum course stumbled across Fred's Psychology Today profile online in which Fred identifies himself to have a Ph.D. and states he "has worked with couples and individuals for over 8 years using a variety of therapeutic techniques." Fred does have a Ph.D.; however, it is a Ph.D. in a non-counseling-related field. In addition to this concern, Fred is turning in incorrect logs. Fred's practicum site supervisor has reached out to his faculty supervisor about this. Fred's site supervisor states they have tried to have multiple conversations with Fred about the logs, but Fred has not fixed them and when reminded about previous conversations "engages in hostile communication." The site supervisor states he now feels uncomfortable communicating with Fred due to multiple unprofessional emails and two in-person meetings in which site supervisor states Fred became "verbally hostile." Fred denies that these conversations and emails happened with the site supervisor even though the site supervisor forwarded email chains to the faculty practicum supervisor. The site supervisor identifies as transgender man and has stated in communication with Fred's faculty supervisor that they have heard rumors at the site of Fred making derogatory comments about their gender identity to other clinicians at the site. The topic

of being discharged from the site came up at the last site meeting, and Fred threatened to sue the site and the site supervisor personally as well as the school (all details according to the site supervisor; the meeting was not recorded) if he is discharged from the site. In class, Fred has not brought any of this up to the faculty supervisor and acts as if all is ok, even talking about how excited he is to work at his site, because he gets to work with a variety of age demographics and presenting concerns.

Ethical Issues

In this vignette, a number of ethical issues exist. Fred misleads the public in his Psychology Today profile, turns in incorrect logs, will not respond to attempts to address the incorrect logs, becomes verbally hostile toward his supervisor when the logs are addressed, lies about the existence of these conversations with his supervisor, reportedly is making derogatory comments about his supervisor's gender identity, threatens to sue the site and school if they take action to address the aforementioned issues, and is not honest with his faculty supervisor about the existence of these concerns at his site. Each issue is directly addressed in the ACA (2014) *Code of Ethics.* Specifically, PPC areas of concern include providing misleading information, poor performance in the class setting, difficulties with affect regulation, and a lack of professional dispositions with others.

First, Fred is misrepresenting himself online regarding the nature of his education and experience. Professional responsibility requires that "counselors aspire to open, honest, and accurate communication in dealing with the public and other professionals" (ACA, 2014, p. 8). The ACA (2014) *Code of Ethics* further clarifies that counselors accurately represent their credentials and services in a "manner that is not false,

misleading, deceptive, or fraudulent" (Standard C.3.a). Additionally, "counselors claim or imply only professional qualifications actually completed" (ACA, Standard C.4.a).

Fred's failure to distinguish on his Psychology Today profile that his Ph.D. is in hypnosis and that he is currently a counseling student in training are explicit misrepresentations of the nature of his education, qualifications, and clinical experience. His Ph.D. in hypnosis is not related to the type of services for which he is advertising on Psychology Today. In addition, his representation of working with couples and individuals for over 15 years using a variety of therapeutic techniques is misleading as it creates the appearance that he has been in practice during this time. The ACA *Code of Ethics* (ACA, 2014, Section C.4.d) requires that counselors do not falsely imply doctoral-level competence in the counseling field when this training does not exist. Additionally, "before providing counseling services, students and supervisees disclose their status as supervisees" (Standard F.5.c). Fred's Psychology Today profile creates a misleading impression that Fred is a doctoral-level counselor, not a trainee in a counseling program.

Fred also falsely represents his work by turning in incorrect logs. Turning in incorrect logs is a violation of his professional responsibility to be accurate in his communication with other professionals (ACA, 2014, Standard C). Fred turning in incorrect logs also violates two foundational principles of ethical behavior and decision-making: fidelity and veracity (ACA, 2014, p. 3). Fidelity addresses the significance of keeping commitments, promises, and "responsibilities of trust in professional relationships" (ACA, 2014, p. 3). Veracity addresses "dealing truthfully with individuals with whom counselors come into professional contact" (ACA, 2014, p. 3). Fred's inaccurate representation of his work on his logs violates veracity, compromising his

ability to adhere to his ethical requirement of fidelity. His misrepresentation to his faculty supervisor about no problems at his site and his excitement about continuing to work there indicates another aspect of Fred's failure to adhere to the ethical principle of veracity (ACA, 2014).

When Fred's supervisor attempts to address the incorrect logs with Fred, he is not responsive to these attempts and becomes verbally hostile instead. The ACA (2014) *Code of Ethics* states, "Professional counselors recognize that the quality of their interactions with colleagues can influence the quality of services provided to clients…[and] counselors develop positive working relationships and systems of communication with colleagues to enhance services to clients" (Standard D). Fred's hostility toward his supervisor is a result of his failure to adhere to the mandate to develop a positive working relationship and system of communication with his supervisor.

Additionally, Fred's reported derogatory comments about his transgender supervisor's gender identity would undermine his ethical mandate to develop a positive working relationship with them (ACA, 2014, Standard D). Fred's reported derogatory comments may also indicate a multiculturally insensitive, hostile posture and an overall lack of multicultural awareness and consideration. The ACA *Code of Ethics* emphasizes that "multicultural counseling competency is required across all counseling specialties" (ACA, 2014, Standard C.2.a). Fred's reported inability to demonstrate multicultural awareness and respect in his professional interactions can reflect this same inability in his clinical interactions with clients. Indeed, the secondary impact of these ethical violations on Fred's clients compounds the seriousness of these violations, especially when a

counselor's ability to establish and maintain a positive therapeutic relationship with their client is a necessary and foundational skill.

Fred's reactions to his supervisor and unwillingness to work collaboratively with his supervisor also raise concerns surrounding his ability to navigate his emotional response to others. The ACA (2014) *Code of Ethics* requires that "students and supervises monitor themselves for signs of impairment from their own physical, mental, or emotional problems" (Standard F.5.b). This ability to self-reflect as part of one's personal growth and self-care process is essential to effective counseling competency. Fred's denial of the existence of his hostile behavior and additional threats to sue the site, site supervisor, and the school raise concern about his ability to receive feedback and reflect on this feedback in a growth-oriented manner.

Also, once Fred's faculty supervisor becomes aware of these issues, they are responsible for addressing them through remediation or dismissal from the site and educational program (ACA, 2014, Standard F.9.b). The ACA *Code of Ethics* states, "Supervisors or supervisees have the right to terminate the supervisory relationship with adequate notice. Reasons for considering termination are discussed, and both parties work to resolve differences" (ACA, 2014, Standard F.4.d.). Fred's unwillingness to work to resolve differences, but rather to threaten legal action, is a direct violation of his ethical responsibility to attempt to work collaboratively with his supervisor around addressing the presenting concerns.

Fred's threat to sue the school if dismissed from the site also does not align with how he represents his experience at his internship site to his faculty supervisor. Stating there are no problems and exhibiting excitement about continuing at his site indicates

another violation of his ethical responsibility of veracity (ACA, 2014). It may be that Fred's defenses are acting such that he genuinely believes that nothing is wrong at his site or with his supervisor. If so, Fred's ability to self-assess appears to be compromised to such an extent that he is unable to adequately monitor for signs of impairment (ACA, 2014, Standards C.2.g & F.5.b). Fred's willingness and ability to respond to remediation may be compromised when combined with an unwillingness to accept or receive feedback. Even so, the school has an ethical responsibility to "assist supervisees in securing remedial assistance when needed" (ACA, 2014, Standard F.6.b).

Areas of Remediation for Fred

Counselor supervisors and educators assess various aspects of counselors-in-training performance, including their traits, clinical expertise, adherence to ethical guidelines, relationships with faculty and peers, mental health, substance misuse, and professional disposition (Brear et al., 2008; Lumadue & Duffey, 1999; Vacha-Haase et al., 2004). Fred must focus on three areas of improvement: professional responsibility, multicultural competence, and documentation. The three areas of improvement can be addressed by the counselor educator, the counseling department, and Fred's site supervisor.

The counselor educator, Fred, and his site supervisor can develop a personalized strategy for addressing his needs, including intervention, monitoring, and remediation of his progress (Dufrene & Henderson, 2009). The purported falsification of qualifications in a publication contravenes the ACA (2014) *Code of Ethics*, which stipulates that counselors must truthfully convey their credentials to the public in a manner that is not deceptive (Standard C.3.a). The counselor educator can meet with Fred to discuss the

importance of this ethical code and support him in telling his site supervisor that he needs to update his Psychology Today profile. Also, while in group supervision, the counselor educator can use this as a teaching moment for other students. While not calling this student out specifically, having this incident occur can be a good reminder to other students, and further discuss advertising themselves.

Counselor educators, according to the ACA *Code of Ethics* (2014), are required to handle multicultural issues within the framework of the supervisory relationship and provide training that improves supervisees' comprehension, skill, and ability in multicultural practice skills (F.2.b, F.11.c). The counselor educator and supervisor would respond to Fred's purportedly disparaging comments regarding the site supervisor. In addition to documenting as required by the ACA *Code of Ethics* (2014), counselors in training and supervisors must ensure that the paperwork appropriately reflects the services provided (Standard A.1.b). In Fred's case, the reported submission of incorrect logs would highlight an area of remediation. The counseling program could support Fred and other students by providing advertising workshops and options for consulting and creating profiles on Psychology Today and other websites. Fred will also be encouraged to discuss advertising with his site supervisor. The site supervisor could utilize supervision time to discuss ethical codes and roleplay appropriate behavior expected from Fred. Multiple forms of supervision could be included, but not limited to, individual, triadic, or group. Considering supervision alternatives can be useful in providing options and increased exposure to support Fred.

Discussion

Gatekeeping in Traditional Versus Online Programs

Gatekeeping and remediation efforts are essential functions to counselor education programs, both traditional and online alike (Haddock et al., 2020). Common to online counselor education programs is the addition of unique barriers to observation and tracking of students' skills and behaviors (Gilbert et al., 2019). Observations of students and their growth throughout counselor education programs must be formatted differently than traditional programs (Chen et al., 2020). The importance of video recording, video conferencing, and the use of other synchronous technologies is paramount in thoroughly assessing students' disposition, skills, and abilities (Snow & Coker, 2020).

Counselor educators also need to employ a more rigorous method of tracking students' performance in online counseling programs (Haddock, 2020). This is in part due to the difference in methods of communication. Emails, phone calls, and shared electronic records have become of greater importance in online communication compared to brick-and-mortar environments. Because of the challenging nature of gatekeeping and remediation in online counselor education programs, centralized committees dedicated to the tracking, monitoring, and implementation of gatekeeping and remediation efforts can be beneficial.

Possible Pitfalls to Gatekeeping and Remediation

Although remediation and gatekeeping are significant and necessary elements of counselor education (ACA, 2014), there are pitfalls that can impact faculty's ability to properly engage in these fundamental components of training (Hunter & Schwartz-Mette, 2023). Three common pitfalls are: (1) a lack of specificity of the problem(s) being

addressed and the plan created to address said problems, (2) a lack of knowledge or fear of improperly following due process, and (3) a lack of faculty insight into emotional components that are a part of remediation and gatekeeping (Chang & Rubel, 2019; DeCino et al., 2020; Schwartz-Mette, 2023). A common error made in the remediation process is not truly understanding the problem (Schwartz-Mette, 2023). This can lead to ineffective remediation plans, which may result in inadequately trained students or unnecessary gatekeeping. Lack of specificity in behavioral problems such as "time management" or "professionalism deficits" can lead to focusing on the wrong problems and miss core issues. Additionally, when it comes to writing a remediation plan, a broad goal such as "improve communication or "work on time management" can lead to a lack of direction and an inability for students to obtain proper support in meeting their goals (Vacha-Haase et al., 2019).

The concept of due process is important in remediation and gatekeeping (Chang & Rubel, 2019). Due process allows each student to experience a fundamental right to fairness. Due process includes issues such as access to program requirements and expectations, access to supported remediation, an option to appeal decisions, and consideration of legal safeguards such as the Family Educational Rights and Privacy Act (FERPA) and the Americans with Disabilities Act (Shah & Fishel, 2023). Pitfalls in remediation and gatekeeping can originate in a lack of knowledge about the implications of due process or experiencing intimidation or fear about possible legal ramifications. Instructing counselor educators while they are earning doctoral-level degrees about due process, as well as institutions training faculty on their organization's practices, is

essential in reducing critical errors that could be made during remediation and gatekeeping (Chang & Rubel, 2019).

Finally, remediation and gatekeeping can be an emotional process for both the student and faculty (DeCino et al., 2020). Mistakes in this area can be made when an educator is not fully aware of the emotions they are experiencing during the process. Fear and apprehension are common feelings faculty may experience as they progress through the course of remediation and gatekeeping. Counselor educators who have been involved in stressful remediation and gatekeeping processes report that the experience not only impacted them professionally but also personally. This results in feelings of isolation because laws such as FERPA require educational information to remain confidential (Shah & Fishel, 2023). Addressing the emotional aspects of remediation and gatekeeping can additionally reduce educator burnout and improve remediation outcomes for students and organizations (Chang & Rubel, 2019; Hunter & Schwartz-Mette, 2023).

Conclusion

Gatekeeping is an ethical obligation carried out to safeguard the integrity of the profession, ensure the well-being of counseling clients, supervise the persistence and completion of students from graduate programs, and foster fairness in the treatment of students (Foster et al., 2014; Freeman et al., 2016; Schuermann et al., 2018). Counselor educators have an ethical duty to supervise and assess students' understanding, abilities, and professional mindset that are essential for them to become proficient professional counselors. Counselor educators are also responsible for addressing and preventing students who lack professional competence from pursuing a career as counselors (CACREP, 2016; Rust et al., 2013; Schuermann et al., 2018).

Gatekeeping is a critical component of counselor education, as required by the ACA *Code of Ethics* (2014, Section F.6.b) and the CACREP standards 2016, Section 6.B.2.i.). These requirements call for counselor education programs to appropriately address, support, and remove students with impairments beyond remediation (Rust et al., 2013). As the landscape of technology continues to develop, this affects counseling programs in a variety of ways. Online programs increasing access to education is one effect of technology in the field of counseling and counselor gatekeeping. Telehealth is another. Due to the increasing demand for online counseling courses and programs, there is a need to train more counseling students remotely (Haddock et al., 2020; Li & Su, 2021). This increase in online learning requires a significant focus on implementing appropriate assessment and gatekeeping techniques (Haddock et al., 2020; Li & Su, 2021). From a gatekeeping standpoint, there will be a continued need for counselor educators to maintain traditional gatekeeping roles as well as be adaptable to new or shifting gatekeeping roles as the profession continues to shift to meet the needs of society.

Counselor educators are actively involved in the crucial position as gatekeepers to ensure that counseling students display competence and an appropriate professional disposition to effectively and safely treat clients. Despite pitfalls, unclear institutional gatekeeping procedures, a sometimes-heavy emotional toll, a substantial amount of time, and concerns of legal recourse (Gaubatz & Vera, 2002; Jacobs et al., 2011; DeCino et al., 2020), counselor educators are charged with the vital responsibility of protecting clients by ensuring students are adequately prepared as professional counselors. Through ongoing evaluation, documentation of concerns, consultation with peers, and well-

defined remediation steps, the ACA *Code of Ethics* (2014) clearly delineates that counselor educators have an ethical and professional responsibility to monitor future counselors' preparedness to treat clients. Gatekeeping presents a multitude of demands from counselor educators. However, despite these demands and challenges, the process of gatekeeping is a complex yet necessary process to ensure clients are safely, ethically, and competently treated by future counselors.

References

American Counseling Association. (2014). *2014 ACA code of ethics*. https://www.counseling.org/docs/default-source/default-document-library/ethics/2014-aca-code-of-ethics.pdf

Americans With Disabilities Act of 1990, 42 U.S.C § 12101 *et seq*. (1990). https://www.ada.gov/pubs/adastatute08.htm

Americans With Disabilities Act Amendment Act of 2008, Pub. L. No. 110-325 (2008). https://www.ada.gov/law-and-regs/ada

Bernard, J. M., & Goodyear, R. K. (2019). *Fundamentals of clinical supervision* (6th ed.). Pearson.

Brear, P., Dorrian, J., & Luscri, G. (2008). Preparing our future counselling professionals: Gatekeeping and the implications for research. *Counselling and Psychotherapy Research*, *8*(2), 93–101. https://doi.org/10.1080/14733140802007855

Brown-Rice, K., & Furr, S. (2016). Counselor educators and students with problems of professional competence: A survey and discussion. *The Professional Counselor*, *6*(2), 134–146. https://doi.org/10.15241/kbr.6.2.134

Brown-Rice, K. A., & Furr, S. (2013). Preservice counselors' knowledge of classmates' problems of professional competency. *Journal of Counseling & Development*, *91*(2), 224–233. https://doi.org/10.1002/j.1556-6676.2013.00089.x

Chang, V., & Rubel, D. (2019). Counselor educators' internal experiences of gatekeeping. *Journal of Counselor Preparation and Supervision*, *12*(4). https://research.library.kutztown.edu/jcps/vol12/iss4/11

Chen, S.-Y., Wathen, C., & Speciale, M. (2020). Online clinical training in the virtual remote environment: Challenges, opportunities, and solutions. *The Professional Counselor*, *10*(1), 78–91. https://doi.org/10.15241/syc.10.1.78

DeCino, D. A., Waalkes, P. L., & Dalbey, A. (2020). "They stay with you": Counselor educators' emotionally intense gatekeeping experiences. *The Professional Counselor*, *10*(4), 548–561. https://doi.org/10.15241/dad.10.4.548

Dufrene, R. L., & Henderson, K. L. (2009). A framework for remediation plans for counseling trainees. In G. R. Walz, J. C. Bleuer, & R. K. Yep (Eds.), *Compelling counseling interventions: VISTAS 2009* (pp. 149-159). American Counseling Association.

Eells, G. T., & Rockland-Miller, H. S. (2010). Assessing and responding to disturbed and disturbing students: Understanding the role of administrative teams in institutions of higher education. *Journal of College Student Psychotherapy*, *25*(1), 8–23. https://doi.org/10.1080/87568225.2011.532470

Elman, N. S., & Forrest, L. (2007). From trainee impairment to professional competence problems: Seeking new terminology that facilitates effective action. *Professional Psychology: Research and Practice*, *38*(5), 501–509. https://doi.org/10.1037/0735-7028.38.5.501

Foster, J. M., Leppma, M., & Hutchinson, T. S. (2014). Students' perspectives on gatekeeping in counselor education: A case study. *Counselor Education and Supervision*, *53*(3), 190–203. https://doi.org/10.1002/j.1556-6978.2014.00057.x

Freeman, B. J., Garner, C. M., Fairgrieve, L. A., & Pitts, M. E. (2016). Gatekeeping in the field: Strategies and practices. J*ournal of Professional Counseling: Practice,*

Theory & Research, *43(*2), 28–41. https://doi.org/10.1080/15566382.2016.12033954

Gaubatz, M. D., & Vera, E. M. (2002). Do formalized gatekeeping procedures increase programs' follow-up with deficient trainees? *Counselor Education and Supervision*, *41*(4), 294–305. https://doi.org/10.1002/j.1556-6978.2002.tb01292.x

Gilbert, A., Neuer Colburn, A. A., Todd, S., & Erwin, K. (2019). Counselor educators' experiences of gatekeeping in online counselor education programs. *The Journal of Counselor Preparation and Supervision*, *12*(4). https://research.library.kutztown.edu/jcps/vol12/iss4/6

Gizara, S. S., & Forrest, L. M. (2004). Supervisors' experiences of trainee impairment and incompetence at APA accredited internship sites. *Professional Psychology: Research and Practice*, *35*(2), 131–140. https://doi.org/10.1037/0735-7028.35.2.131

Haddock, L., Cannon, K., & Grey, E. (2020). A comparative analysis of traditional and online counselor training program delivery and instruction. *The Professional Counselor*, *10*(1), 92–105. https://doi.org/10.15241/lh.10.1.92

Homrich, A. M. (2009). Gatekeeping for personal and professional competence in graduate counseling programs. *Counseling and Human Development*, *41*(7), 1–24.

Homrich, A. M., DeLorenzi, L. D., Bloom, Z. D., & Godbee, B. (2014). Making the case for standards of conduct in clinical training. *Counselor Education and Supervision*, *53*(2), 126–144. https://doi.org/10.1002/j.1556-6978.2014.00053.x

Hunter, E. A. & Schwartz-Mette, R. A. (2023). Troubleshooting common pitfalls. In R. A. Schwartz-Mette, E. A. Hunter, & N. J. Kaslow (Eds.), *Supporting trainees with competence problems: A practical guide for psychology trainers* (pp. 213–230). American Psychological Association. https://doi.org/10.1037/0000340-012

Jacobs, S. C., Huprich, S. K., Grus, C. L., Cage, E. A., Elman, N. S., Forrest, L., Schwartz-Mette, R., Shen-Miller, D. S., Van Sickle, K. S., & Kaslow, N. J. (2011). Trainees with professional competency problems: Preparing trainers for difficult but necessary conversations. *Training and Education in Professional Psychology*, *5*(3), 175–184. https://doi.org/10.1037/a0024656

Jorgensen, M., Brown-Rice, K., & Olson, S. D. (2017). Clinical supervisors' knowledge of supervisees with problems of professional competency. *The Journal of Counselor Preparation and Supervision*, *10*(1). https://research.library.kutztown.edu/jcps/vol10/iss1/4

Li, D., & Su, Y.-W. (2021). Online teaching and learning in counselor education: A 23-year content analysis. *Counselor Education and Supervision*, *60*(4), 316–330. https://doi.org/10.1002/ceas.12219

Lumadue, C. A., & Duffey, T. H. (1999). The role of graduate programs as gatekeepers: A model of evaluating student counselor competence. *Counselor Education and Supervision*, *39*(2), 101–109. https://doi.org/10.1002/j.1556-6978.1999.tb01221.x

Rapp, M. C., Moody, S. J., & Stewart, L. A. (2018). Becoming a gatekeeper: Recommendations for preparing doctoral students in counselor education. *The Professional Counselor*, *8*(2), 190–199. https://doi.org/10.15241/mcr.8.2.190

Rose, J. S., & Persutte-Manning, S. (2020). Students with problems of professional competency and their impact on proficient students in counseling programs. *The Journal of Counselor Preparation and Supervision*, *13*(4). https://research.library.kutztown.edu/jcps/vol13/iss4/4

Rust, J. P., Raskin, J. D., & Hill, M. S. (2013). Problems of professional competence among counselor trainees: Programmatic issues and guidelines. *Counselor Education and Supervision*, *52*(1), 30–42. https://doi.org/10.1002/j.1556-6978.2013.00026.x

Shen-Miller, D. S., Schwartz-Mette, R., Van Sickle, K. S., Jacobs, S. C., Grus, C. L., Hunter, E. A., & Forrest, L. (2015). Professional competence problems in training: A qualitative investigation of trainee perspectives. *Training and Education in Professional Psychology*, *9*(2), 161–169. https://doi.org/10.1037/tep0000072

Schuermann, H., Avent Harris, J. R., & Lloyd-Hazlett, J. (2018). Academic role and perceptions of gatekeeping in counselor education. *Counselor Education and Supervision*, *57*(1), 51–65. https://doi.org/10.1002/ceas.12093

Schwartz-Mette, R. A. (2023). Remediation, counseling out, and dismissal. In R. A. Schwartz-Mette, E. A. Hunter, & N. J. Kaslow (Eds.), *Supporting trainees with competence problems: A practical guide for psychology trainers* (pp. 99–123). American Psychological Association. https://doi.org/10.1037/0000340-007

Shah, S. & Fishel, S. R. (2023). Legal issues in working with trainees with problems of professional competence. In R. A. Schwartz-Mette, E. A. Hunter, & N. J. Kaslow (Eds.), *Supporting trainees with competence problems: A practical guide for*

psychology trainers (pp. 171–191). American Psychological Association. https://doi.org/10.1037/0000340-010

Snow, W. H., & Coker, J. K. (2020). Distance counselor education: Past, present, future. *The Professional Counselor*, *10*(1), 40–56. https://doi.org/10.15241/whs.10.1.40

Vacha-Haase, T., Davenport, D. S., & Kerewsky, S. D. (2004). Problematic students: Gatekeeping practices of academic professional psychology programs. *Professional Psychology: Research and Practice*, *35*(2), 115–122. https://doi.org/10.1037/0735-7028.35.2.115

Vacha-Haase, T., Elman, N. S., Forrest, L., Kallaugher, J., Lease, S. H., Veilleux, J. C., & Kaslow, N. J. (2019). Remediation plans for trainees with problems of professional competence. *Training and Education in Professional Psychology*, *13*(4), 239–246. https://doi.org/10.1037/tep0000221

Wissel, A. M. (2014). Gatekeeping in counselor education: Experiences of terminating students for nonacademic concerns. *VISTAS Online*, Article 8. https://manifold.counseling.org/system/resource/9/0/8/9081d193-5c62-4914-9222-2d4fab3d2ab7/attachment/ed4b472938c1169bee8e59357fbb8d54.pdf