

## The Journal of Counselor Preparation and Supervision

---

Volume 12 | Number 3

Article 7

---

2019

### Teaching Ethical Decision-Making in Counselor Education

Dana H. Levitt

Montclair State University, [levittd@mail.montclair.edu](mailto:levittd@mail.montclair.edu)

Connie S. Ducaine

Kimberly Greulich

Kelly Gentry

Lisa Treweeke

Follow this and additional works at: <https://repository.wcsu.edu/jcps>

 Part of the [Counselor Education Commons](#)

---

#### Recommended Citation

Levitt, D. H., Ducaine, C. S., Greulich, K., Gentry, K., & Treweeke, L. (2019). Teaching Ethical Decision-Making in Counselor Education. *The Journal of Counselor Preparation and Supervision*, 12(3). Retrieved from <https://repository.wcsu.edu/jcps/vol12/iss3/7>

---

## Teaching Ethical Decision-Making in Counselor Education

### Abstract

How and when counseling graduate students are taught to apply ethical codes and principles varies. In this article the authors review foundational concepts and proposed practices for ethics education in graduate counseling programs. The authors present strategies for teaching ethical decision-making that focus on the intersection of personal values, principle and virtue ethics, and self-reflection. Recommendations are provided for content delivery and activities and assignments that encourage self-reflection of values in conjunction with the application of decision-making skills and models. Implications for future research are addressed.

### Keywords

ethics, decision-making, counselor preparation, counselor education

Ethical decision making is a complex process that requires knowledge of ethical codes and legal obligations, awareness of personal values, authenticity, and confidence in one's own clinical judgment skills (Jungers & Gregoire, 2016; Lambie, Hagedorn, & Ieva, 2010; Lambie, Ieva, & Ohrt, 2012). Both *Ward v. Wilbanks* (2009) and *Keeton v. Anderson-Wiley* (2010) highlighted instances in which counselor trainees were dismissed from programs given their unwillingness to provide services based on their personal and religious beliefs. These situations informed the current case law, and highlight the importance of providing students with tools for ethical decision making. Ethical violations abound across counseling settings and with varied issues and populations (Neukrug & Milliken, 2011). Ahia and Boccone (2017) noted nearly 1,000 ethical violations were adjudicated in 18 states between 2009 and 2013. In its most recent report, the American Counseling Association Ethics Committee stated the organization received 1,739 ethics inquiries during the 2016 fiscal year (ACA, 2016). Even and Robinson (2013) reported that the most frequent ethical violations relate to professional competency, with 22.3% relating to sexual and non-sexual boundary violations and 10% relating to confidentiality. The American Counseling Association (2014) likewise reported the majority of cases relate to boundaries (sexual and non-sexual) and counselor competence. In light of these statistics, counselor education programs have increasing responsibility and accountability for the ethical preparation of counselors.

Although recommendations for teaching ethics exist in the literature, there are few examples of comprehensive approaches to counselor preparation in ethical decision-making. The purpose of this article is to explore the ethical preparation of counselors and recommend strategies to increase ethical practice beyond graduate training. Based on the literature, we conceptualize ethics education that attends to personal self-reflection, a values perspective, and a case-based approach to learning. The *ACA Code of Ethics* (2014) emphasis on values and how values relate

to specific decision-making practices is especially salient (Kaplan, 2014). As counselor educators and practitioners we have witnessed the gaps that exist and as a result we propose the content that should be included in counselor ethics preparation, recommendations for placement of ethics education in the curriculum, and methods of delivery. The following recommendations are not comprehensive and therefore we invite readers to extrapolate material that fits their program, training needs, and trainee dispositions.

### **Elements of Ethical Decision-Making Education**

The foundation and bridge between theory and practice of ethical decision-making can provide a framework to scaffold students' learning. We propose counselor educators include the following components for teaching ethical decision-making, grounded in the literature and through application that may be meaningful to address students' development, foundations of ethics, and the application of decision-making models. Our goal in bridging theory and practice is to help students explore how their values serve as a foundation to authenticity in decision-making. By encouraging authenticity, counselor-in-training will learn to own the process of ethical decision making and be less focused on looking for black and white answers in the code of ethics.

### **Values Exploration**

Values serve as a foundation to authenticity. Authenticity is an asset for any counselor faced with an ethical dilemma. When one operates from a place of authenticity, they reflect on personal values with a focus on how the decision will affect those involved, accepting responsibility for the decision, rather than relying on the code of ethics and ridding themselves of any accountability (Jungers & Gregoire, 2016). Therefore, it is significant to begin teaching ethics through an emphasis on students' values and values exploration. Values exploration might include encouraging reflective practices outside of the program, assuming a position of authenticity

regarding challenges, addressing personal worlds, and attending to students' individualized learning needs and reasons for entering the counseling profession (Levitt, Thomas, & Henning, 2012).

Students may demonstrate a sense of apathy towards values exploration since they have little understanding of the challenges they may face as they attempt to integrate personal values with ethical codes. However, over time students recognize that ethical decision-making requires integration of personal values, ethical standards, and the law, making it a more complex process than they had anticipated (Ametrano, 2014). Another study revealed counseling students' ambivalence about values and counseling, which demonstrates that values exploration must be a critical component of counselor development (Burkholder & Hall, 2014).

### **Values and Self-Reflection**

Values exploration is not a new concept in counselor education. Several authors (e.g., Gladding, 2012; Levitt & Aligo, 2013; Levitt & Moorhead, 2013; Levitt et al., 2012; Pack-Brown, Thomas, & Seymour, 2008; Remley & Herlihy, 2016; Young, 2013) have advocated for self-reflection as a general practice in counselor preparation. Burkholder and Hall (2014) determined that current students advocate for self-reflection in the curriculum, citing awareness of the intersection of personal and professional values with the *ACA Code of Ethics* (2014) in the *Ward v. Wilbanks* case. Students may need more directive guidance to self-reflect on values in addition to addressing awareness of values that may be in conflict with their beliefs. In counselor preparation, it becomes the responsibility of faculty to help students develop skills to “apply a reflective process in the here and now of the counseling encounter to manage the necessary bracketing” (Choudhuri & Kraus, 2014, p. 195). Therefore, we advocate for continued attention to

self-reflection with consideration of the skills faculty may teach students to engage in their own values exploration in the reality of the counseling setting.

### **Ethical Foundations and Processes**

Ametrano's (2014) study demonstrated the efficacy of values exploration as a pathway towards effective exploration of ethical issues. An overview of professional identity, covered throughout the counselor education curriculum, should include an introduction to the intersection of personal and professional ethics. Students may then be introduced to virtue and principle ethics, with application to understanding how they apply to counselor practice.

The foundation for ethical practice seems to reside in a sense of professional identity. One must have awareness of what it means to be a counselor to appreciate the nature of professional guidance. Remley and Herlihy (2016), for example, distinguished the counseling profession as its own discipline in an effort to highlight the expectations of professional activities and perspectives. A wellness approach may inform the management of ethical issues and guide decision-making. Therefore it would benefit counseling programs to spend significant time addressing the professional identity of counselors. As students develop an appreciation of the importance of our professional identity, this understanding will provide them with clarity as to why they are expected to handle professional and ethical issues as guided through professional literature (Kaplan, 2014; Levitt & Moorhead, 2013; Remley & Herlihy, 2016). Professional values, as espoused directly in the *ACA Code of Ethics* (2014), become more salient to the practicing counselor with a sense of connection to one's professional philosophy.

### **Principle and Virtue Ethics**

The *ACA Code of Ethics* (2014) is founded on Kitchener's (1984) principle ethics and serves to guide counselors with actions. The principles of autonomy, beneficence, nonmaleficence,

fidelity, justice, and veracity are included in foundational ethics texts (e.g., Remley & Herlihy, 2016) and serve as a basis for determining appropriate ethical actions. Virtue ethics focus on questions of character and guide counselors to consider their perspectives and values in challenging situations. The virtue ethics of integrity, discernment, self-awareness, acceptance of emotion, and community interdependence inherently require self-reflection (Levitt & Aligo, 2013). Attention to principle and virtue ethics throughout counselor education curricula may contribute to counselor trainees' abilities to self-reflect and enter an informed and authentic decision-making process.

### **Ethical Decision-Making Models**

Ethical decision-making models (EDMMs) provide a structured process for approaching ethical dilemmas (Lambie, Ieva, Mullen, & Hayes, 2011). According to Cottone and Claus (2000), EDMMs fall into three categories: theoretical and philosophical; practice-based; and models designed for specialty practice and populations (i.e. couples counseling, school counseling). Within each of the EDMMs is a stage model or step-by-step process through which each counselor is assumed to progress in order to make the most informed ethical decision. Common steps in the models usually include identifying the problem, reflecting on values, consulting ethical standards, considering opposing views and potential consequences, consulting with professionals, and taking action (Cottone & Claus, 2000).

The development of EDMMs, although more than thirty years old (Kitchner, 1984), is still young in terms of empirical evidence demonstrating effectiveness (Cottone & Clause, 2000), and subsequently, is still evolving in theory and practice. Most recently, the literature has drawn attention to the importance of self-awareness (Ametrano, 2014; Levitt et al., 2012) and addressing value-based conflicts (Kocet & Herlihy, 2014) as critical to comprehensive applications of ethical

decision making models. The myriad decision-making models should be presented to burgeoning counselors as a means to begin discerning how to approach ethical challenges given the luxury of time with written cases before they enter practice.

However, a recent study by Levitt, Farry, and Mazzarella (2015) suggested that counselors do not directly use EDMMs in their practice. Counselors indicated that they tend to rely on personal values and look towards clients' best interests, transparency in decision-making, and a backdrop to their formal training in ethical decision-making in rendering decisions (Levitt et al., 2015). Personal values emerged as a prominent theme for participants in this qualitative study. Given the numerous decision making-models and the conflicting views in the literature regarding the interpretation of ethical codes (Kocet & Herlihy, 2014), there may be little practicality in focusing solely on decision making models and the *ACA Code of Ethics* (2014) without the context of personal values. Since values are a consistent thread particularly in the *ACA Code of Ethics* (2014), it seems fitting to include personal values exploration in the counselor preparation curriculum as a base for counselors' ethical decision-making.

### **Values and Ethical Decision-Making Models**

Kocet and Herlihy (2014) proposed an ethical bracketing model in which students learn through self-reflection the nature of collaborative and relational ethics. The ethical bracketing model follows standard ethical decision-making models in which counselors identify the problem, self-reflect on the nature of the core issues and barriers to care, seek consultation with the *ACA Code of Ethics* (2014) and literature on best practices, seek supervision, and determine and evaluate actions (Kocet & Herlihy, 2014). The model adds a linear process to guide counselors to intentionally consider how their values are guiding their decision-making. Kocet and Herlihy (2014) proposed that delineation of personal and professional values in the process can help



counselors clarify how to best serve their clients. Understanding the personalized process of making decisions might be a critical factor in increasing student ethical decision-making skills.

The practice of teaching ethical decision making models is most often through the use of ethical vignettes (Ametrano, 2014; Moffett Becker, & Patton, 2014). Ethical vignettes allow students to apply recently obtained knowledge about codes of ethics and assess the steps they would take in addressing the specific ethical dilemma (Ametrano, 2014). We will further discuss the nature of vignettes and case-based learning later in the manuscript. We encourage readers to consider how they might guide students in the resolution of these cases through the application of professional codes of ethics.

### **Codes of Ethics**

The primary role of a code of ethics for any profession is to establish standards and commonly accepted practices as well as expectations of the individuals or collective group that are bound by the code (Francis & Dugger, 2014). The *ACA Code of Ethics* (2014), along with other divisional ethical codes (e.g. ASCA, AMHCA, NASPA) and professional codes (NBCC), occupies an integral role in the content that is delivered for the ethical preparation of counselors. Through the internalization of the professional ethical code, counselors equip themselves with a prescription for acceptable behavior, and it is highly important that we teach the ethical code in a way that is clear and meaningful.

Ametrano (2014) found that early in ethics education many students rely heavily on the *ACA Code of Ethics* (2014) to find concrete answers to make decisions or come to conclusions and to provide a rationale for how the code influenced their decision-making process. Over the course of the semester, however, students came to understand the role of the *ACA Code of Ethics* (2014) in their decision-making as a guide and not an answer key (Ametrano, 2014). While the *ACA Code*

*of Ethics* (2014) is a cornerstone of values held collectively by the profession, it is meant to be internalized and integrated with one's personal values (Francis & Dugger, 2014). It is therefore necessary to emphasize the open-ended nature of the ethical code and the importance of integrating the guidelines it provides with personal values and ethical decision-making models.

### **Case-Based Learning**

Case-based methods are among the most common and established methods of teaching ethics and the application of ethical decision-making models (Levitt et al., 2012). Case-based scenarios allow counselor educators to introduce ethical dilemmas within a controlled and monitored environment. Review and discussion of cases or vignettes helps students develop ethical sensitivity, or their ability to recognize that there has been an ethical issue that may require action (Moffet et al., 2014). Students are first asked to identify the ethical dilemma, and then to describe what action they think should be taken given the information they have been provided. After making their decision, students can then compare it with the responses of counseling professionals, enabling them to consider their rationale and reflect on personal values. Moffett et al. (2014) pointed out that case-based activities may be the first instance in which students are asked to articulate what motivates their decision-making process.

Levitt and Moorhead (2013) suggested that self-reflection and values exploration should be the first step in reviewing cases, before counselor trainees begin identifying issues and potential actions. Case-based learning and consultation can be employed at multiple points in the curriculum. We recommend a case-based approach to ethics across the counseling curriculum that includes self-reflection of personal values in decision-making (Choudhuri & Kraus, 2014).

The provision of cases for learning can be challenged by issues of confidentiality if faculty choose to draw from clinical experiences. Counselor educators are encouraged to provide realistic,

meaningful and ambiguous cases so that counselors can prepare for the realities of practice and understand that there are often multiple courses of action that adhere to ethical guidelines (Levitt & Moorhead, 2013). A developmental approach to case selection follows the research on counseling students' cognitive complexity (Granello, 2002, 2010). To minimize the risk of students feeling overwhelmed by the challenging dilemmas faced by counselors, counselor educators would be wise to integrate a gentle approach to cases as students develop their skills of self-reflection and decision-making. For example, Henderson and Malone (2012) suggested adapting fairy tales to a counseling context. Ethical dilemmas in this format provide the safety of familiarity and humor to lessen their gravity. The classroom also provides a safe atmosphere to explore issues and to make mistakes, thereby increasing opportunities to reflect on one's personal and professional positions (Levitt et al., 2012).

### **Selected Activities**

In this section we offer sample activities that may be introduced throughout the curriculum or in a discrete ethics course. We offer these activities as suggestions, and encourage programs to consider the specific needs and characteristics of their students. In Table 1 we offer suggestions of how to cover ethics across the counselor education curriculum in selected courses.

Table 1

*Curricular Infusion Course Content and Examples*

Course	Course Content	Examples
Foundations	Counselor Values, Decision-Making Models (introduction), Code of Ethics	Values conflict scale Developmentally- appropriate decision- making vignettes Overview of codes of ethics
Counseling Techniques	Values Exploration, Ethical Foundations	Values conflict scale Role plays with assigned and potentially challenging client values/beliefs
Lifespan/ Human Development	Moral Development (Kolhberg & Gilligan)	Application of moral development model to case study Response to modern adaptation of Kohlberg's Heinz dilemma as a counselor Introduction of Gilligan's care and justice moral orientations
Multicultural Counseling	Values Exploration, Virtue and Principle Ethics, Decision-Making Models	Values conflict scale Cultural immersion exercise Small group discussion of personal and professional cultural values Application of decision- making models to culturally-bound case studies
Practicum and Internship	Code of Ethics, Decision-Making Models, Application of Models in Practice	Intentional application of ethical decision-making models to case presentations Values jar

The timing and structure of activities should be consistent with students' development and recommendations for scaffolding material. The complicated nature of ethical issues and decision-making requires scaffolding to ensure a foundation for engaging in the multidimensional issues

that present (Granello, 2010). Counselors must be able to focus on the ethical dilemmas rather than memorize ethical decision-making steps and the *ACA Code of Ethics* (Levitt et al., 2012). The activities in this section were designed for a discrete ethics course; many may likewise be included in other courses across the curriculum as developmentally appropriate and relevant.

### **Values Exploration Activities**

In keeping with a values emphasis, specific activities may be introduced to help students begin to explore their values, morals, and judgments as they pertain to the counselor role. Two of our favorite activities, the values conflict scale and values jar, may be appropriate in both discrete and infused ethics modalities.

The values conflict scale is a series of client descriptions to which students respond whether they could work with the client, they would have difficulty working with the client, or that they could not work with the client. The intent of the scale is to assist students to begin identifying values that could present challenges to them if clients present with beliefs different from their own. Sommers-Flanagan and Sommers-Flanagan (2015) provided sample values exploration scales related to personal values to use before considering an application to counseling relationships, which may be helpful in foundational counseling courses or early in an ethics class. The values conflict scale might include examples of clients with fundamentalist or conflicting religious views, infidelity, interracial relationships, political affiliations different than one's own, positions on immigration, same sex marriage or adoption, or other pertinent issues. We regularly update the client descriptions on the scale to address timely societal and professional issues, and to address needs that we see emerging in our program.

A related activity is the values jar, which is introduced in the context of helping students to see how their values play a part in a counseling relationship. A prop of an actual glass jar serves

as a place for students to place slips of paper on which students privately write the concerns they have about prospective values in counseling. We then seal the jar, indicating that during counseling sessions we are aware that our values are there but that they cannot come out during a session. Thus, values may guide our work, but do not direct or spill out into our intent to help clients who may hold different values and morals than we do. Keeping the jar sealed yet visible reminds us that we can take off the top and address personal values and perspectives at a more appropriate time. The jar is present in each of our class sessions to remind us of their presence and how to address them, at times taking off the top in class for discussion.

### **Case-Based Learning**

We have established throughout the manuscript the benefits of a case-based approach to ethics. We encourage counselor educators to be creative in this approach beyond the nature of the cases they write. For example, it is sometimes helpful to have students in small groups write cases themselves to reflect what they see as potential ethical dilemmas in practice. Student groups may then trade cases and analyze them through ethical decision-making processes, coming back to the full class to discuss what they found and what the original writers intended as potential issues. This tends to create opportunities for students to hear multiple perspectives as well as learn about peers' concerns, value conflicts, and in some cases reflections on issues they have seen in their fieldwork experiences. Whether students are writing cases themselves or analyzing those written by the instructor, case analysis should include attention to personal values before determining courses of action. In keeping with the values perspective, attention to visceral reactions and inclinations is important when there is the luxury of time and fictional cases. Students may then spend time applying decision-making models, codes of ethics, and legal statutes to their resolution of issues.

In some cases it may even be worthwhile to role play scenarios to experience the challenges in coming to and carrying out their decisions.

### **Ethics Board Hearing**

One of the most effective ways we have seen students learn about ethical decision-making and the *ACA Code of Ethics* (2014), how ethical violations happen, rendering ethical decisions, and the adjudication process is through a mock ethics board hearing. An early instructor's guide to Remley and Herlihy's (2016) *Ethical, Legal, and Professional Issues in Counseling* included an example of an ethics board hearing activity. We have significantly modified an example to address current and relevant issues in counselor practice. A case is shared with students in advance of the class so that they may become familiar with the issues involved. Upon arrival in class, students are randomly assigned to roles (e.g., accused counselor, complainants, witnesses for the counselor and complainants, board attorney, board hearing officer, board members) and given brief backgrounds about their positions. We then use a full class meeting to walk through the hearing as it would take place with a state licensure board. The students assigned to board member roles are charged with asking questions and determining whether the counselor has violated identified sections of the *ACA Code of Ethics* (2014) and state guidelines, then selecting the appropriate sanction. The end of class and the next class meeting are spent discussing the process and determining as a class the sections of the *ACA Code of Ethics* (2014) and state guidelines in question as well as how to adjudicate and sanction counselors. Students comment that this is the most meaningful activity in the course because of the realistic nature of the process and the ability to question the role of their own values in the process.

## Sample Course Assignments

In addition to the class activities described, counselor educators may also consider meaningful course assignments that address the foundational elements regarding ethics education. Table 2 provides a brief description of three assignments we have found effective in reinforcing students' application of ethical decision-making in meaningful ways that they can bring into practice. As noted, these assignments are designed for a discrete ethics course. However, an adaptation of the assignments to course content may create similar learning opportunities for students to incorporate ethics.

Table 2

### *Sample Ethics Course Assignments*

Assignment	Purpose	Description
Article Reviews	Enter the literature and consider ethical issues in practice	3 current articles, overview and critical reflection
Group Project and presentation	Explore ethical issues and apply decision-making models and code of ethics	Case study, values-based consideration, application
Ethical Issues Interview and Paper	Examine ethical issues faced by counselors and their decision-making practices	Interview practicing counselor, research regarding the issues, consider values in resolution of the dilemma, apply ethical decision-making to student decision-making

## Conclusion and Directions for Research

Ethics education in the counselor preparation curriculum is merely the beginning of the integration of ethics into practice. Practitioners often have autonomy, and as such it is imperative that counselors build an infrastructure to support their ethical decision making process (Brennan,



2013). The results of Herlihy and Dufrene's (2011) Delphi study confirmed the importance of ethical practice and preparation. A panel of experts identified their number one concern for the profession was "ensuring counselors practice ethically and abide by the code" (Herlihy & Dufrene, 2011, p.16). The same panel also noted that teaching ethical decision making in counselor education programs should be a priority. A survey of ACA members revealed that 97% of counselors had ethics instruction in graduate school (Neukrug & Milliken, 2011). The researchers highlighted concerns when they reported that there were 31 items (40% of the survey) to which respondents could not agree as to whether a particular behavior was unethical. This discrepancy suggests there is a need to increase awareness of ethical issues for both practitioners and students and to further examine ethical preparation for counselors and supervisors.

Much remains to be learned about best practices in counselor ethics preparation. Interpretation and application of the *ACA Code of Ethics* (2014), recent court cases, and continued study of ethical violations provides a foundation for learning what counselor preparation programs can do to ensure the safety and well-being of the clients their future counselors will serve. As counselor educators continue to explore their own successes, we encourage programs to consider the nature of delivery as well as cognitive complexity in their application of activities.

Curricular infusion, or the integration of specific material into core courses, is common across several topics in counseling programs. The professional literature remains undecided about the efficacy of curricular infusion or a discrete ethics course as a preferred mode of delivery. The conflicting perspectives as to the best way to teach ethics and the placement of this topic in the curriculum are not unique to the counseling profession. The field of social work appears to struggle with the same question, which remains unanswered even after empirical study of ethical practice on the basis of discrete or infused ethics preparation (Sanders & Hoffman, 2010). The Council for

the Accreditation of Counseling and Related Educational Programs (CACREP) standards outline the content areas that must be introduced but do not dictate the manner in which they are taught (CACREP, 2015). This affords accredited counselor preparation programs flexibility in how to teach material that is common across core content areas. For example, ethical issues are cited in Professional Identity and Ethical Practice, Assessment, and Research curricular standards (CACREP, 2015). Programs may elect to cover the material throughout all of their courses or to relegate it to a single class. Incorporating discussions regarding ethical issues across multiple courses in a counseling program offers learners opportunities to revisit and gain exposure to the topic in a variety of contexts as they develop. A discrete ethics course can increase knowledge but it may not allow adequate time for students to develop their decision-making skills (Lambie et al., 2012). The development of decision-making skills can require up to 12 months to accomplish; therefore, relying on a one semester, 13-6 week course to adequately address ethical decision-making may be problematic (Lambie et al., 2010).

It appears from our initial review of the literature and an analysis of syllabi available via the ACA-ACES Syllabus Clearinghouse that much of the content of a discrete ethics course focuses on the professional codes of ethics. While significant, there are limitations to introducing and discussing ethical codes absent an application through the presentation of ethical decision-making models and values exploration. These limitations suggests that the course content should also address underlying concepts of ethics, such as decision-making and personal and professional values as they relate to professional expectations and a values emphasis in the *ACA Code of Ethics* (2014).

According to Ametrano (2014), "...for students, learning to make ethical decisions is a developmental process of acculturating to the ethics of the profession and eventually integrating

professional ethics with their own values and beliefs” (p. 154). Cognitive complexity is the ability one has to consider multiple perspectives, accept ambiguity, and integrate new concepts into their worldviews (Granello, 2010; Lambie et al., 2010). Cognitive complexity might be considered a key component in how and when ethical content and ethical decision making models are introduced to students. Counseling researchers have determined that as counselors-in-training progress in their programs, their cognitive complexity increases (Granello, 2002; Lambie et al., 2010; Lambie et al., 2012). If this is indeed the case, then the ability to recognize ethical dilemmas and make sound ethical decisions would be more developed the further students are in the counseling curriculum.

Beginning counselors-in-training are often frustrated with instructors who cannot give expert advice or definitive answers (Granello, 2002; Granello, 2010; McAuliffe & Lovell, 2006). Ethics can be vague and leave much room for interpretation, and counselors-in-training often find this concept difficult to grasp as there is the perception that there is a single right answer. Students become more comfortable with the ambiguity and the contextual nature of counseling as they progress through the curriculum. In essence, they are more flexible in their counseling practice. Cognitive development can be attributed to factors such as knowledge gained, clinical experience (practicum), and life experience, all of which allow for ethical learning (Lambie et al., 2010; Lambie et al., 2012). Counselor educators must therefore consider students’ cognitive development in both the placement and content of ethics education.

More research is needed regarding best practices through an empirical study of training modalities. We need to know the efficacy of content emphasis and sample activities relative to counselors’ ethical decision-making immediately after exposure and longitudinally through ethical practice as professional counselors. Researchers might also explore the nature of ethical violations

and their relationship to the format, content, and timing of ethics education. Qualitatively, we might learn more about the actual vs. educational ethical decision-making process (Levitt et al., 2015). Finally, it seems appropriate in counseling research to solicit perceptions of clients: what do they perceive as effective practice, and how does this match with our expectations for ethical conduct that we teach burgeoning counselors?

## References

- Ahia, C. E., & Boccone, P. J. (2017). Licensure board actions against professional counselors: Implications for counselor training and practice. *VISTAS Online*. Retrieved from [www.counseling.org/knowledge-center/vistas/by-subject2/vistas-professional-development/docs/default-source/vistas/article\\_396bce2bf16116603abcacff0000bee5e7](http://www.counseling.org/knowledge-center/vistas/by-subject2/vistas-professional-development/docs/default-source/vistas/article_396bce2bf16116603abcacff0000bee5e7)
- American Counseling Association (2014). *Code of ethics*. Alexandria, VA: Author.
- American Counseling Association (2016). ACA annual ethics report – Fiscal year 2016. Retrieved from <https://www.counseling.org/knowledge-center/ethics#reports>
- Ametrano, I. M. (2014). Teaching ethical decision making: Helping students reconcile personal and professional values. *Journal of Counseling and Development, 92*(2), 154-161. doi:10.1002/j.1556-6676.2014.00143.x
- Brennan, C. (2013). Ensuring ethical practice: Guidelines for mental health counselors in private practice. *Journal of Mental Health Counseling, 35*(3), 245-261.
- Burkholder, D., & Hall, S. F. (2014). Ward v. Wilbanks: Students respond. *Journal of Counseling and Development, 92*, 232-240. doi: 10.1002/j.15566676.2014.00152.x
- Choudhuri, D. D., & Kraus, K. L. (2014). Buddhist perspectives for addressing values conflicts in counseling: Possibilities from practice. *Journal of Counseling and Development, 92*, 194-201. doi:10.1002/j.1556-6676.2014.00148.x
- Council for the Accreditation of Counseling and Related Educational Programs (2015). *CACREP 2016 Standards*. Alexandria, VA: Author.
- Cottone, R. R., & Claus, R. E. (2000). Ethical decision-making models: A review of the literature. *Journal of Counseling and Development, 78*, 275-283.
- Even, T. A., & Robinson, C. R. (2013). The impact of CACREP accreditation: A multiway frequency analysis of ethics violations and sanctions. *Journal of Counseling and Development, 91*, 26-34. doi: 10.1002/j.1556.6676.2013.00067.x.
- Francis, P. C., & Dugger, S. M. (2014). Professionalism, ethics, and value-based conflicts in counseling: An introduction to the special section. *Journal of Counseling and Development, 92*(2), 131-134. doi:10.1002/j.1556-6676.2014.00138.x
- Gladding, S. T. (2012). *Counseling: A comprehensive profession* (7th ed.). Upper Saddle River, NJ: Pearson.
- Granello, D. H. (2002). Assessing the cognitive development of counseling students: Changes in epistemological assumptions. *Counselor Education & Supervision, 41*, 279- 293. <http://dx.doi.org/10.1002/j.1556-6978.2002.tb01291.x>
- Granello, D. H. (2010). Cognitive complexity among practicing counselors: How thinking changes with experience. *Journal of Counseling and Development, 88*, 92-100. <http://dx.doi.org/10.1002/j.1556-6678.2010.tb00155.x>
- Henderson, K. L., & Malone, S. L. (2012). Ethical fairy tales: Using fairy tales as illustrative ethical dilemmas with counseling students. *Journal of Creativity in Mental Health, 7*, 65-82. doi:10.1080/15401383.2012.660128
- Herlihy, B., & Dufrene, R.L. (2011). Current and emerging ethical issues in counseling: A delphi study of expert opinions. *Counseling and Values, 56*, 10–24. doi: 10.1002/j.2161-007X.2011.tb01028.x

- Jungers, C. M., & Gregoire, J. (2016). Authenticity in ethical decision making: Reflections for professional counselors. *Journal of Humanistic Counseling, 55*, 99-110. doi: 10.1002/johc.12027
- Kaplan, D. M. (2014). Ethical implications of a critical legal case for the counseling profession: Ward v. Wilbanks. *Journal of Counseling and Development, 92*, 142-146. doi: 10.1002/j.1556-6676.2014.00140.x
- Kitchner, K. S. (1984). Intuition, critical evaluation and ethical principles: The foundation for ethical decisions in counseling psychology. *The Counseling Psychologist, 12*, 43-55.
- Kocet, M. M., & Herlihy, B. J. (2014). Addressing value-based conflicts within the counseling relationship: A decision-making model. *Journal of Counseling and Development, 92*, 180-186. doi: 10.1002/j.1556-6676.2014.00146.x
- Lambie, G. W., Hagedorn, W. B., & Ieva, K. P. (2010). Social-cognitive development, ethical and legal knowledge, and ethical decision making of counselor education students. *Counselor Education and Supervision, 49*(4), 228-246.
- Lambie, G. W., Ieva, K. P., Mullen, P. R., & Hayes, B. G. (2011). Ego development, ethical decision-making, and legal and ethical knowledge in school counselors. *Journal of Adult Development, 18*, 50-59. doi: 10.1007/s10804-010-9105-8
- Lambie, G. W., Ieva, K. P., & Ohrt, J. H. (2012). Impact of a counseling ethics course on graduate students' learning and development. *International Journal for the Scholarship of Teaching and Learning, 6*, 1-15.
- Levitt, D. H., & Aligo, A. (2013). Moral orientation as a component of ethical decision-making. *Counseling and Values, 58*, 195-204. doi: 10.1002/j.2161-007X.2013.00033.x
- Levitt, D. H., Farry, T., & Mazzarella, J. (2015). Counselor ethical reasoning: Decision-making practice vs. theory. *Counseling and Values, 60*, 84-99. doi: 10.1002/j.2161-007x.2015.00062x.
- Levitt, D. H., & Moorhead, H. H. (Eds.). *Values and ethics in counseling: Real-life ethical decision-making*. New York, NY: Routledge.
- Levitt, D. H., Thomas, A., & Henning, A. (2012). The application of ethical decision-making and self-awareness in the counselor education classroom. *Journal of Counselor Preparation and Supervision, 4*(2), 41-52. doi:10.7729/42.0029
- McAuliffe, G., & Lovell, C. (2006). The influence of counselor epistemology on the helping interview: A qualitative study. *Journal of Counseling and Development, 84*, 308-317.
- Moffett, L. A., Becker, C. L. J., & Patton, R. G. (2014). Fostering the ethical sensitivity of beginning clinicians. *Training and Education in Professional Psychology, 8*(4), 229-235.
- Neukrug, E. S., & Milliken, T. (2011). Counselors' perceptions of ethical behaviors. *Journal of Counseling and Development, 89*, 206-216. doi: 10.1002/j.1556-6678.2011.tb00079.x
- Pack-Brown, S. P., Thomas, T. L., & Seymour, J. M. (2008). Infusing professional ethics into counselor education programs: A multicultural/social justice perspective. *Journal of Counseling and Development, 86*(3), 296-302.
- Remley, T. P., Jr., & Herlihy, B. (2016). *Ethical, legal, and professional issues in counseling* (5th ed). Upper Saddle River, NJ: Pearson.

- Sanders, S., & Hoffman, K. (2010). Ethics education in social work: Comparing outcomes of graduate social work students. *Journal of Social Work Education*, 46(1), 7-22.
- Sommers-Flanagan, R., & Sommers-Flanagan, J. (2015). *Becoming an ethical helping professional: Cultural and philosophical foundations*. Hoboken, NJ: Wiley.
- Young, M. E. (2013). *Learning the art of helping: Building blocks and techniques* (5th ed.). Upper Saddle River, NJ: Pearson.