

The Role of Graduate Programs as Gatekeepers: A Model for Evaluating Student Counselor Competence

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Current literature indicates that in addition to academic ability, counselor educators must also assess students' personal characteristics and clinical skills. Given the increased awareness of the possible damage caused by counselors who do not possess the personal qualities and requisite skills, faculty may be expected to serve as gatekeepers for the profession. This article reviews the ethical and legal mandates relevant to developing and implementing a gatekeeping model. It presents a model endorsed, in principle, by the Texas Association of Counselor Educators that uses a behaviorally specific student evaluation instrument developed in accordance with competencies outlined in the American Counseling Association (1995) *Code of Ethics and Standards of Practice*.

Monitoring the competency of student counselors has always been an important component in counselor training programs. Historically, issues involving student rights have been the prerogative of the university and its faculty (Meyer, 1980). However, with increased concern about due process and fear of legal ramifications, faculty began to focus on academic criteria (e.g., grades) as the basis for student dismissal (Oklin & Gaughen, 1991). Current literature indicates that clinical assessment by counselor educators cannot be accomplished by simply measuring a student's ability to perform academically (Baldo, Softas-Nall, & Shaw, 1997; Frame & Stevens-Smith, 1995). In addition to academic performance, counseling students are expected to possess personal qualities, characteristics, and evidence of readiness conducive to effective

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therapeutic practice. Given these expectations and the increasing awareness of the damage to clients that may be caused by counselors who do not possess these skills, faculty may be expected to serve as gatekeepers for the profession. However, little has been published regarding effective policies and procedures for student review and retention.

In our review of the literature, two models were found to be relevant to this discussion of gatekeeping. These were presented by Frame and Stevens-Smith (1995) and by Baldo et al. (1997). In this article, we present a model that incorporates the advantages of these two models but takes them a step further by offering a behaviorally specific student evaluation instrument. The model of gatekeeping we present was developed by faculty at Southwest Texas State University (SWT, 1996) and endorsed, in principle, by the Texas Association of Counselor Education and Supervision (TACES). The student evaluation instrument is based on competencies articulated in the American Counseling Association (ACA; 1995) *Code of Ethics and Standards of Practice*. This instrument may be used to assist programs in implementing more effective counselor trainee evaluation and assessment and may also serve as an effective research instrument.

ETHICAL AND LEGAL ISSUES IN GATEKEEPING

Before developing or implementing a model of gatekeeping, ethical and legal mandates related to remediating or dismissing students should be considered. According to the ACA (1995) *Code of Ethics and Standards of Practice*:

Counselors, through on-going evaluation and appraisal, are aware of the academic and personal limitations of students and supervisees that might impede performance. Counselors assist students and supervisees in securing remedial assistance when needed, and dismiss from the training program supervisees who are unable to provide competent services due to academic or personal limitations. Counselors seek professional consultation and document their decision to dismiss or refer students or supervisees for assistance. Counselors assure that students and supervisees have recourse to address decisions made to require them to seek assistance or to dismiss them. (Section F.3.a., pp. 15-16)

This statement directly supports Section F.1.g., Responsibility for Services to Clients (ACA, 1995), which addresses the responsibility that supervisors have in assuring the welfare of clients counseled by students in training programs. In addition to ethical codes, relevant legal cases should be reviewed before programs develop a gatekeeping model.

Regarding legal issues, Oklin and Gaughen (1991) charged that training programs, in dealing with students who have impairments

(i.e., lack the requisite personal qualities, characteristics, and clinical skills for effective therapeutic practice), have been acting as if they anticipate not only being taken to court but also losing the case. They question whether programs are attempting to shift the responsibility of managing issues regarding students with impairments to others, such as peers and work-setting supervisors. In fact, Oklin and Gaughen noted that courts consistently support the rights of specialty programs to dismiss students with impairments. Program responsibility for adequately identifying, remediating, or dismissing students with impairments was an issue in the 1988 suit filed against a counselor in Louisiana for improper treatment of a client, and against the clinic for which the counselor worked. The initial suit was settled in 1994 for \$1.7 million. It was expanded to include Louisiana Tech University, the psychiatrist who was supervising the counselor, and the physician who allegedly gave the client periodic examinations. Regarding the university's responsibility, the attorney for the client stated, "We're testing a new theory. I believe that a university has an obligation not only to the degree participants, but also to the public, (to ensure) that a person who graduates from its program is competent in the area in which the degree is bestowed" (Custer, 1994, p. 7).

In addition to the legal ramifications for universities for failure to properly prepare students (which includes failure to address student impairment), it is important that program faculty, supervisors, and administrators be aware of pertinent legal decisions regarding student dismissals that are relevant to counselor education programs. Many of these cases have been filed by students dismissed from medical schools. All cases involved charges of violation of due process protection (Oklin & Gaughen, 1991).

Due Process as a Function of Gatekeeping

Constitutional due process guarantees that no state may "deprive any person of life, liberty, or property, without due process of law, nor deny to any person within its jurisdiction the equal protection of the laws" (Murphy, 1994, p. 1013). Due process may be *substantive* or *procedural*. Substantive due process indicates that dismissal from the program was not based on "arbitrary, capricious, or prejudicial treatment by the program faculty" (Knoff & Prout, 1985, p. 790). Procedural due process dictates that a student receive adequate notice and an opportunity for a hearing or formal defense.

Legal cases involving due process issues resulting in dismissal of students have been historically divided into two categories: disciplinary and academic (Knoff & Prout, 1985). The courts have

consistently upheld the right of institutions to dismiss or to terminate students based on the evaluation of qualified faculty as long as due process is observed (*Cornelly v. University of Vermont and State Agricultural College*, 1965; *Gaspar v. Bruton*, 1975; *Goss v. Lopez*, 1975). *Greenhill v. Bailey* (1975) clarified for programs that any notification of a student's academic deficiencies prior to termination satisfies due process conditions. Also, any decision that has potential for negative effects on a student's future education or employment should allow for an opportunity for the student to respond; however, the response may be conducted in the form of an "informal give and take" (p. 9). Additional court decisions further clarified procedures for termination and due process (*Board of Curators of the University of Missouri v. Horowitz*, 1978; *Harris v. Blake and the Board of Trustees of the University of Northern Colorado*, 1986; *Shuffer v. Trustees of California State University and Colleges*, 1977).

Academic Criteria in Gatekeeping

The court's definition of *academic performance* is significant for the process of gatekeeping. In *Greenhill v. Bailey* (1975), the performance evaluated included the "student's demonstrated knowledge, technical and interpersonal skills, attitudes, and professional character" (Knoff & Prout, 1985, pp. 791-792). In the case of *Harris v. Blake and the Board of Trustees of the University of Northern Colorado* (1986), a psychology graduate student, Harris, was not allowed to register for practicum. This decision was made by Blake, Harris's professor, on the basis of specific behaviors deemed directly applicable to the student's performance, which Blake termed *incompetent* and *unethical*. Blake described Harris' behaviors as "[in]ability to verbalize his own or others' perceptions, lack of attentive behavior, paucity of listening skills, no warmth, genuineness, respect, or empathy in his interactions with clients or fellow classmates" (p. 421).

Given the ethical mandates related to gatekeeping (ACA, 1995), the growing likelihood of ramifications for failing to properly prepare students (Custer, 1994), the tendency of the field to attract people who use the training program to work through their own issues (May, Remen, Young, & Breland, 1985; Wakefield, 1995) and the stress of working in the profession (Corey, Corey, & Callanan, 1998), it is incumbent upon programs to directly address student impairment. According to Guy (1987), "Although there is a need for better identification of impaired therapists and more effective remedial programs, there is an even greater need to prevent distress and impairment before it results in profes-

sional incompetence" (p. 232). Students are unlikely to address their own impairment (Corey et al., 1998), and even less likely, as professionals, to express concerns about any impairment of their peers (Bennett, 1986).

Gatekeeping Procedures

Oklin and Gaughen (1991) suggested a process of gatekeeping in which identification and evaluation of problem students would include written policies and procedures that address the process of evaluation and remediation. This process involves three steps: formulating operational definitions of expected student behaviors, providing these policies and procedures in writing to students upon entry into the program, and routinely examining students on both academic and nonacademic criteria. They also recommended that programs develop more varied remediation strategies and dismiss those students who are not judged as competent clinicians by faculty. More recent literature (Baldo et al., 1997; Frame & Stevens-Smith, 1995; Procidano, Busch-Rossnagel, Reznikoff, & Geisinger, 1995) continues to suggest procedures for programs to use in evaluating students. These include defining competencies that the profession expects students to possess, developing policy for dealing with students with impairments and problems that adequately conforms to due process requirements, and creating a well-developed, published screening and evaluation mechanism.

Frame and Stevens-Smith (1995) and Baldo et al. (1997) presented the only models found in the literature for this decade. Frame and Stevens-Smith described the process developed by faculty at the Counseling Psychology and Counselor Education Division of the University of Colorado at Denver for monitoring and dismissing students who are not maintaining acceptable professional nonacademic behavior. This process has contributed greatly to the profession's awareness of the need for a gatekeeping process that guarantees due process for both faculty and students. It incorporates the characteristics of an effective process described previously. Noteworthy is the 5-point Likert-type instrument, the personal characteristics evaluation form. It identifies the following nine characteristics faculty believed to be essential functions in counselor development: being open, flexible, positive, cooperative, willing to use and accept feedback, aware of impact on others, able to deal with conflict, able to accept personal responsibility, and able to express feelings effectively and appropriately.

Baldo et al. (1997) offered an alternative to the model presented in Frame and Stevens-Smith (1995). They contended that the Frame and Stevens-Smith model might place a faculty member who re-

ports students with impairments in a difficult position. The identified student may direct feelings of aggression toward the faculty member because of the negative evaluation that instigated the actions taken toward him or her. The policy that Baldo et al. described includes the use of a faculty review committee to correct this potential problem. The model developed by faculty at the University of Northern Colorado, Division of Professional Psychology (1995) has four advantages: It guarantees due process for both faculty and student, it offers clear steps and specific actions to take regarding remediation and dismissal, it is based on judgment of the entire faculty, and it has been used successfully.

SWT Gatekeeping Model

The counseling faculty at SWT devised a gatekeeping model that offers a systematic means to evaluate student performance and establishes a formalized structure to address student impairment and appropriate remediation or dismissal. In developing this model, faculty sought to accomplish six goals:

- To identify the qualities and behaviors expected of students
- To reach faculty consensus on the expectations for student fitness and performance
- To devise a rating form listing these qualities and behaviors
- To standardize evaluation procedures within the department by using these forms
- To communicate these expectations to all students in each class
- To include these expectations in the admissions packet issued to interested students

Specific steps were taken to meet these goals. First, a four-member committee of the faculty was formed to create an instrument to evaluate fitness and performance. The committee used the expectations provided by the ACA (1995) *Code of Ethics and Standards of Practice* as the foundation for developing the evaluation instrument. Second, the committee collected existing criteria used for evaluation by faculty members, then discussed and devised an evaluation instrument. Next, the entire faculty reviewed, discussed, and modified the instrument, ultimately reaching consensus on the expectations and methods of implementation. After implementation, the final step was to modify the language to clarify specific behaviors.

The final draft of the instrument, called the Professional Performance Fitness Evaluation (PPFE), includes a 4-point rating: N—no opportunity to observe, 0—does not meet criteria for program level, 1—meets criteria only minimally or inconsistently for pro-

gram level, and 2—meets criteria consistently at this program level. The five major areas assessed are counseling skills and abilities, professional responsibility, competence, maturity, and integrity. Each area has specific behavioral components that define the competencies expected of the student in that area. (See Endnote.)

According to this model, students are first notified of the gatekeeping process after their expression of interest in the program. Included in the admissions packet is a letter notifying students that they will be evaluated on their professional and personal competencies throughout the program using the PPFE.

Students are also informed via course syllabus and verbally on the first day of each class about the specific criteria on which they will be evaluated. This evaluation process is conducted by each professor on both the personal and the professional competencies listed on the evaluation form at the completion of each semester. The forms are reviewed with the student, who must receive satisfactory scores on the evaluation to pass the class.

When a problem is identified, an individual faculty member may meet with the student to afford him or her the opportunity to address the problem. If the problem is not resolved, the faculty member then submits a letter to the departmental chairperson requesting that the student meet with the Faculty Review Committee, which consists of three faculty members. The purpose of the Faculty Review Committee is to assess the student's performance and recommend a course of action that may include any of the following: the student is ready and fit to continue, the student should undergo remediation, or the student should be dismissed from the training program.

Upon receipt of the letter from a faculty member requesting review of a student, the chairperson of the department informs the student in writing and requests his or her presence at the review scheduled 2 weeks subsequent to the mailing of the letter to the student. The student may bring a representative to the review to assist him or her in the process.

After meeting with the Faculty Review Committee, a recommendation by the committee is made to the chairperson, who notifies the student of the committee's decision. The student has the right to appeal the decision. If the student decides to appeal, the student begins the appeal process by stating the intention to do so in a letter to the chairperson. The student meets with the chairperson who either supports or does not support the decision of the committee. If the student does not agree with the decision of the chairperson, he or she may appeal to the dean of the college. If the student's appeal is denied, the student's next recourse is to initiate legal action.

The SWT model offers two additional advantages to the Baldo et al. (1997) and the Frame and Stevens-Smith (1995) models discussed earlier. First, the SWT model begins with the admissions process, and it stresses evaluation early in the student's academic career. A copy of the student evaluation form (PPFE) is included in the student's admissions packet. Second, the evaluation criteria used in the instrument include specific behaviors rather than the abstract characteristics in the instrument presented by Frame and Stevens-Smith (1995). Specific behavioral criteria may assure greater consistency in evaluation among faculty and between faculty and site supervisors and may afford students greater self-monitoring ability.

CONCLUSION AND IMPLICATIONS

This article presented a review of ethical and legal mandates relevant to developing and implementing procedures for evaluation, remediation, and dismissal of impaired or incompetent students. A gatekeeping model was presented. While incorporating advantages of previous models, this model offered two additional advantages. First, the criteria for evaluating students are disseminated to all interested students in the admissions packet. Second, the competencies outlined in the ACA (1995) *Code of Ethics and Standards of Practice* serve as the basis for the development of the PPFE. This student evaluation instrument includes specific behaviors that allow for greater consistency in student evaluation and greater ease in student self-assessment. It also offers an instrument that may be used in research.

Although the PPFE is currently in use at SWT, further research is needed to provide empirical evidence of its effectiveness. The PPFE may be used to study differences in student competency. The results of this research may provide information useful to developing more effective forms of remediation and aid in program development. Research to investigate inter-rater reliability among faculty or between faculty and off-campus site supervisors in their evaluation of students is also needed. This would assure that the expected competencies were being assessed in a consistent manner. Finally, there should be further study regarding faculty concerns about and possible resistance to assuming the role of gatekeeper. Research in this area could assist programs to address faculty issues about gatekeeping, thus facilitating the development and implementation of effective gatekeeping policies and procedures.

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Endnote. Copies of the Professional Performance Fitness Evaluation (PPFE) may be obtained from Thelma Duffey, Assistant Professor, Department of Educational Administration and Psychological Services, Southwest Texas State University, San Marcos, TX 78666.