#### Article 11

# **Gatekeeping in Counselor Education**

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#### Introduction

The topic of "clinical impairment" among students in master's level counseling preparation programs has been significant for many years yet neglected in research and elusive in definition, existence, and implementation. Despite the importance of defining, understanding, and implementing guidelines when addressing trainee impairment, little research exists in this area (Forrest, Elman, Gizara, & Vacha-Haase, 1999). Some of the

existing literature in this area examines the limiting academic admission criteria (Graduate Record Examination [GRE] and Grade Point Average [GPA] ) used by committees in the screening process, and some suggests the additional use of non-academic admission criteria to predict professional or counseling success (Bradey & Post, 1991; Nelson, Canada, & Lancaster, 2003). One can infer that understanding both academic and non-academic concerns about students' performance is crucial in being able to address impairment. In addition to weak admission criteria, this review found that many institutions do not have guidelines set to properly handle a situation with an impaired student. The lack of set procedures has created counselor hesitancy and reluctance to address the issue of impairment (Enochs & Etzbach, 2004).

According to Brear, Dorrian, and Luscri (2008), gatekeeping is the evaluation of student suitability for professional practice. It is a mechanism that aims to ensure the health of the profession by controlling access to it. Gatekeeping involves the identification of evaluative criteria and process, and the accountability of the gatekeeper to apply the criteria and take responsibility for the evaluative outcomes. In counselor education, it is a metaphor identifying the process of monitoring progression through a series of stages via critical points of entry or passage – usually by an experienced member of the profession who, on behalf of the profession and the welfare of future clients, simultaneously oversees the academic and or clinical development of the individual entering the field of practice, allowing passage only once a set of competencies has been demonstrated (Homrich, 2009). Foster and McAdams (2009) stated that gatekeeping refers to the responsibility of all counselors, including student counselors, to intervene with colleagues and supervisors who engage in behavior that could threaten the welfare of those receiving services.

Gatekeeping requires a system of evaluation of both professional and personal competence for the field. Homrich (2009) reported that most counselor educators are proficient and feel comfortable with their roles in evaluating academic performance and clinical skills. More problematic for counselor educators who are evaluating and endorsing the readiness of a student for professional practice is the "person" of the counselor, the less clearly defined intrapersonal and interpersonal professional behaviors that enable a counselor to effectively establish a therapeutic relationship (Homrich, 2009). Due to the subjective nature of what counselor educators are looking for when identifying students with personal competence problems, difficulties abound in defining this concept. This subjective nature further creates difficulties in reaching consensus among faculty regarding who meets criteria, in communicating acceptable standards to students, and in explaining and defending decisions to dismiss students by faculty (Homrich, 2009). Several of these concepts will be described in greater detail throughout the course of this manuscript.

Identifying and working with impaired students of counseling is an important task for counselor educators and supervisors alike. Just as important is the development of specific criteria that constitute "impairment" and a working and universal definition of the term. Capps (2008) reports little agreement about what constitutes impairment, thus no concrete definition of impairment exists. The lack of definition and criteria makes it even more difficult for counselor educators to address the issue of impairment and stay atop of best practices in the field.

# **History of Definitions**

The immediate problem within the existing dialogue is the lack of a universal definition of impairment in the counseling field. The current language for defining a student who is performing inadequately due to a physical or emotional deficiency is broad. However, other professions have addressed this issue, which can form a bridge towards a definition. The American Medical Association (AMA) has had an extensive relationship with the issue of impairment. In 1972 the AMA issued a definition of impairment as "the inability to practice medicine with reasonable skill and safety due to physical or mental disabilities, including deterioration through the aging process or loss of motor skill, or abuse of drugs and alcohol" (Texas Medical Association, 2007).

During their annual convention in 1981, the American Psychological Association (APA) identified problems related to impairment such as alcohol and drug abuse and dependencies, sexual intimacy with a client, mental illness, and suicide. Through this identification psychologists defined impairment as "interference in professional functioning due to chemical dependency, mental illness, or personal conflict" (Laliotis & Grayson, 1985).

Ten years later the counseling profession formed a task force to address impairment by conducting a study with counselors. Although the study provided statistics regarding the number of impaired counselors during the year 1991, it did not develop a working definition that would be embraced by the field.

Several authors described the problems created by the lack of a consistent, universal definition of gatekeeping (Brear et al., 2008; Elman & Forrest, 2007; Forrest et al., 1999; Homrich, 2009). Terminology has changed many times over the years, which has contributed to a lack of confidence and comfort with performing the role of gatekeeper and evaluator, and has led to challenges in identifying and isolating criteria for "impairment" (Bhat, 2005; Homrich, 2009). Homrich (2009) described the importance of faculty reaching consensus regarding standards for performance expectations, which will help avoid conflicting expectations, inconsistent enforcement, and interfaculty disagreement.

Existing literature includes a variety of views on what terminology to use when describing students who are struggling. Homrich (2009), Brear et al., (2008), and Elman and Forrest (2007) suggested that terms such as "impaired" or "incompetent" not be used due to their overlap with legal terms used by the Americans with Disabilities Act (ADA). Elman and Forrest (2007) recommended terminology that focuses on the inclusion of the problem, the professional standard, and a focus on competence, leading them to suggest using terms such as "problems with professional competence," "problematic professional competence," or "professional competence problems." Elman and Forrest (2007) described the benefits of utilizing "problematic" terminology over the previous "impaired" descriptions, including having no overlap with the ADA, combining personal and academic evaluation, and distinguishing between the description of the behavior and causes of the behaviors. For these reasons, the term "problematic" will be used throughout this manuscript when describing students who are identified as needing remediation through the gatekeeping process.

Another factor inherent in the lack of a clear definition of describing and identifying problematic students is the absence of a distinction between various types of competence problems and levels of functioning of the student (Elman & Forrest, 2007;

Homrich, 2009). Counselor educators need to clarify whether the student is unable or unwilling to perform at an acceptable level, whether the student's current level of functioning is temporary or chronic, or whether previously functional behaviors have diminished or never existed in the first place (Forrest et al., 1999). Forrest et al. (1999) went on to assert that these distinctions are vital not only for accurate identification of problematic students, but also for determining the best plans for remediation and intervention.

In their collective case study of supervisors' experiences with impaired trainees, Gizara and Forrest (2004) identified three key themes in the participant's definition of impairment: 1) the intern's behavior was professionally unethical, harmful, and deficient, 2) there was a clear pattern in the behavior, and 3) behavior was not improving. From these themes one can infer from the trainee's behavior that he or she has had a definitive reversal in performance or is unable to meet the requirements of the training program through his or her behavior. While a specific definition cannot be detracted from this one study, the themes fall in line with a definition offered by Lamb et al., (1987) that states:

Trainee impairment is an interference in professional functioning that is reflected in one or more of the following ways: a) an inability and/or unwillingness to acquire and integrate professional standards into one's repertoire of professional behavior; b) an inability to acquire professional skills to reach an acceptable level of competency; c) an inability to control personal stress, psychological dysfunction, and/or excessive emotional and behavioral reactions that interfere with professional functioning. (p. 598)

The definition described encompasses the three clear categories and themes listed above (Gizara & Forrest, 2004) that deem an individual too problematic to continue training. Accepting such a definition would help counselors today fulfill their ethical obligation to evaluate students.

## **Ethics and Roles of Gatekeeping in the Counseling Profession**

According to the American Counseling Association's (ACA) *Code of Ethics and Standards of Practice* (2005) and the Council for Accreditation of Counseling and Related Educational Programs (CACREP) standards (2009), it is the professional and ethical obligation of counselor educators to screen and assist counselor trainees while they are students. The responsibility to review students' academic performance and personal and professional development belongs to the admitting counselor education staff. In other words, faculty members are responsible for the students they accept into their program. This places the responsibility on faculty and supervisors to make decisions that protect the client about whether or not certain behaviors are simply problematic or truly representative of impairment. It is important to note, however, that the same ethical codes require counselors (including counselor trainees) to seek assistance on their own when they feel impaired. Unfortunately, there are many instances when impaired students do not seek assistance and it is up to the program to intervene.

Counselor educators are responsible for "gatekeeping" the profession (McAdams, Foster, & Ward, 2007). The ACA *Code of Ethics* (2005) provides several codes related to the act of gatekeeping in the profession:

- Code F.1.a describes the role of counseling supervisors in monitoring client welfare and the services provided by counseling students.
- Code F.5.b explains how counseling supervisors must help impaired counseling students to seek remediation when needed.
- Code F.9.a describes the counselor educator's role in evaluating counseling students throughout the program.
- Code F.9.b specifically addresses the steps counselor educators must take when an impaired student is recognized.

# **Identification of Problematic Students**

There are several factors to consider when evaluating student impairment versus the evaluation of a professional counselor who has completed training. Bemak, Epp, and Keys (1999) noted that students may not be cognitively and personally developed to acknowledge, understand, and cope with distress that may interfere when providing counseling. Olkin and Gaughen (1991) created a questionnaire to explore the policies and procedures used by counselor educators to identify, evaluate, and potentially dismiss impaired students. In reporting their results regarding the methods used by the surveyed programs to identify impaired students, the researchers stated that

most programs (65%) identified problem students through academic course work, and over half the programs (54%) identified students through practicum or other clinical courses. Faculty referrals (36% of programs) and routine student evaluations (28%) were also frequently cited as the means to identify problem students. Off-campus supervisors (23% of programs) and grade point average (19%) were less frequently the sources of problem student identification. (Olkin & Gaughen, 1991, para. 32)

It is clear that problematic students may be identified through a variety of means, though counselor educators often experience difficulties in the identification process due to disagreement about what constitutes an adequate performance from a student or the perceived subjectivity of the data that is being used to identify the student as problematic (Forrest et al., 1999).

Another common difficulty for faculty in identifying potentially problematic students is the screening procedures applied to determine academic success in a counseling program. Historically, graduate programs have used academic criteria such as the grade point average (GPA) and test scores from the Graduate Record Examination (GRE) to predict potential for academic success in graduate counseling programs. In their investigation of non-academic admission criteria for doctoral students, Nelson et al. (2003) reported that research has demonstrated that these scores are predictive of academic success in graduate school. However, admitting faculty agree that academic and non-academic admission criteria such as autobiographies and interviews are important in the screening process, as GRE scores and GPA scores are not predictive of professional or counseling success. It seems that despite general acceptance and use, non-academic criteria lack predictive validity and further research is needed in this area.

Once accepted into a counselor education program, a student's academic success is measured through formal reviews such as academic screening, tests, and grades. Bradey and Post (1991) reported that formal ongoing screening procedures are more

commonly utilized than informal methods. The authors recommend for programs to use more informal screenings and that counselor educators need to develop more effective manners to evaluate student characteristics such as interpersonal competency, openness to professional development, and openness to other's thoughts and values. Having set informal and formal admission guidelines and ongoing formal and informal screening procedures is crucial to the gatekeeping responsibilities placed upon counselor educators. The barriers in working with students already admitted to counseling programs are greater than those met at initial contact. These barriers include the challenge of determining a definition for and a better understanding of what constitutes impairment (Bradey & Post, 1991; Gizara, 1997; Stadler, Willing, Eberhage, & Ward, 1988). The precariousness of addressing the issues of impairment and dysfunction may also cause issues within the faculty (Capps, 2008).

### **Prevalence of Problematic Students**

There has been a great deal of research on the prevalence of problematic students in mental health training programs, yet according to Gaubatz and Vera (2002), these students may be more prevalent than originally thought. These authors found that faculty in master's counseling programs estimated that approximately 10% of their students were poorly suited for the field and that interventions are made with approximately half of these students. Gaubatz and Vera went on to say that faculty at CACREP programs rated fewer of their students to be problematic, only 7% as opposed to non-CACREP programs at 13% (they attributed this to the CACREP programs use of more formalized gatekeeping procedures). Gaubatz and Vera also found that approximately 5% of students may be problematic yet receive no remediation. The authors additionally explained that "gateslipping" rates were higher in programs that had an increased number of adjunct faculty, had greater institutional pressures not to screen for problematic students, or where faculty held personal concerns (e.g., low teaching evaluations, threat of legal retribution) regarding performing this role.

In another study, Gaubatz and Vera (2006) again compared students versus faculty perceptions of trainee competence. The majority of faculty (98%) indicated that they were aware of problematic students in their programs and many of these students went on to graduate. However, prevalence rates varied greatly in student versus faculty views, with students estimating that as many as 21% of their peers have problems with professional competence, as opposed to 9% estimated by faculty. Although some of these students received remediation, not all of them did. Gaubatz and Vera found that according to faculty views, approximately 3% of these students gateslipped, whereas student estimates of gateslipping could be as high as 18%. These percentages could translate to more than 330 problematic students graduating and entering the profession yearly (Gaubatz & Vera, 2002).

### **Implementation**

Another barrier to working with students already admitted concerns the student's rights to privacy and due process. To label a student problematic carries a heavy weight of personal, professional, and legally binding problems. Due process ensures that decisions made by the program are not arbitrary or personal and it requires universities and programs to identify evaluative guidelines and procedures (Lamb et al., 1987). Once

a student is deemed problematic, they are allowed to dispute their dismissal through claims in court or even make claims related to the Americans with Disabilities Act (ADA; Forrest et al., 1999). Once a student accepts a plan for remediation (such as attending therapy), he or she must give consent for their therapist to release information which covers his or her right to privacy, as the information could be detrimental to reacceptance into the program. Universities and faculty members are highly impacted by the presence of legal action. Thus, Enochs and Etzbach (2004) strongly urged that guidelines be set that clearly address the supervisors' or faculty members' actions needed to protect the client from the problematic student.

Because faculty members are responsible for students accepted and graduated from their programs, it is important they make the right decisions about issues that interfere with students' abilities to perform in either an academic or clinical setting (Wilkerson, 2006). It is critical for problematic students to receive assistance to help remedy the problem affecting their performance as clinicians.

Universities and programs that fail or are reluctant to act upon student impairment and graduate such individuals face greater issues. Kotter and Hazler (1996) suggested that the reluctance of counselors to address the issue of impairment may create symptoms of impairment in a troubled student. However, more important is the liability that comes with the reluctance. Universities who graduate a student who is not properly trained can be held liable for injuries and damages caused by the client of that particular student (Enochs & Etzbach, 2004).

## **Gatekeeping Models for Best Practices**

Homrich (2009) stated that the three best practices programs can use to improve their gatekeeping protocol are to establish the expectations, communicate them clearly and widely, and have faculty consistency in enforcement. She emphasized that being clear and consistent with the process and expectations adds dignity to the situation for the students going through it.

Homrich (2009) described a gatekeeping process that begins prior to the application process for students and continues throughout their training. This process begins by establishing a philosophy of training via the program mission statement that communicates expectations that interpersonal and intrapersonal processes are essential qualities of the educational experience and that these qualities are to be evaluated throughout the training process. She recommended communicating these program expectations clearly and widely to ensure congruence between students and programs. This process begins prior to admission for prospective students by making the policy known via graduate handbooks, web sites, etc. Specifying the expectations and giving advance notification of the procedures and consequences helps to serve as informed consent. At the admissions stage, screening for problematic students and behaviors continues through interviews, essays, and letters of recommendation. However, Bradey and Post (1991) asserted that counselor education programs need better mechanisms than grade point average and other academic measures, as these do not indicate or predict counselor competence or screen for interpersonal problems. It is recommended that incoming students are made aware of the professional competence expectations at the outset of their program through handbooks, mission statements, and program objectives. Homrich (2009) also recommended that it is responsible policy to obtain signed informed consent from entering students to ensure that they understand the policies of the programs they will be attending. For continuing students, the process of systematic assessment through comprehensive, regularly scheduled, documented evaluations is critical. Informal evaluations through classes, field activities, and interpersonal exchanges with faculty, peers, supervisors, and site colleagues are also beneficial. It is incumbent on the faculty to initiate an ongoing process and apply it fairly and consistently.

Use of formalized review procedures to promote more effective gatekeeping was recommended by Gaubatz and Vera (2002). The authors found that faculty in programs that have formalized procedures for evaluating students, like those utilized in CACREP programs, led to lower reports of student's gateslipping. These findings led the authors to suggest that instituting formalized gatekeeping evaluations and procedures will reduce the number of problematic students programs graduate, making it perhaps the most critical component to effective gatekeeping. In 2006, Gaubatz and Vera again found that gateslipping rates were lower among CACREP programs and among programs with formalized gatekeeping procedures, reemphasizing that formalized procedures may lead to reductions in gateslipping.

To ensure due process is served for students, Forrest et al. (1999) recommended five tips for programs. First, establish written program descriptions including reasons for termination from the program. Second, perform routine written and oral evaluations by faculty which includes evaluations of the students personal and interpersonal functioning. Thirdly, provide written prescriptions for remediation specifying expected behavioral changes, a timeline, and that failure to remediate may result in termination from the program. Fourth, establish a notification process for dismissal. And lastly, establish procedures that permit the student to appeal a decision to dismiss.

Forrest et al. (1999) also identified the most common types of remediation to be personal therapy for the student, repeated coursework, increased supervision, recommending a leave of absence, and tutoring. When a student has been identified as in need of remediation, a remediation plan should be established and communicated to that student. Forrest et al. (1999) recommended that the remediation plans should identify and describe the deficiencies that are directly tied to the evaluative criteria. Next, they should identify specific goals or changes for the student. The plan should also identify possible methods for meeting these goals. The plan should establish criteria for evaluating whether the student has been successful in his or her remediation attempts. And lastly, it should determine a timeline for reevaluating the student. Forrest et al. (1999) went on to describe the possible outcomes of remediation as (a) determination that concerns have been addressed and changed, so the student is allowed to continue in the program, (b) the student has not met full criteria for improvement, so they are continued on probation and an updated remediation plan is established, (c) the student is counseled out of the program, and (d) the recommendation and initiation of a formal dismissal.

An additional approach to gatekeeping is Wilkerson's (2006) application of the *Therapeutic Process Model* to counseling and training. This proposed model uses five of the commonly accepted components found in the therapeutic process: informed consent, intake and assessment, evaluation, treatment planning and follow up, and termination. Wilkerson suggested that these five components be used by counselor educators in preparing and setting guidelines and policies to address problematic students.

# **Challenges to Effective Gatekeeping**

The role of gatekeeping can be difficult because faculty members are vulnerable to an attack, both personally and professionally (Kerl & Eichler, 2005). Faculty may find the process of dealing with a problematic counseling student to be emotionally challenging. McAdams et al. (2007) described gatekeeping as a "painful process" (p. 220). Counseling faculty members are usually naturally empathic people who tend to lean toward helping students improve deficient skills rather than dismissal (Kerl & Eichler, 2005). Often, faculty members delay remediation action, simply hoping the problem will resolve itself (McAdams et al., 2007). The emotional challenge can be especially painful and exhausting for faculty who need to dismiss a counseling intern, since a relationship has likely already been formed with this student (Gizara & Forrest, 2004).

The role of gatekeeping for counseling faculty can also have professional implications. Gaubatz and Vera (2002) stated that fears of job security may contribute to the level of students "gateslipping." In this study, untenured faculty members were more concerned with receiving unflattering teaching evaluations during gatekeeping procedures.

Concerned faculty have to deal with student rights, institutional pressures, and client protection issues (Gaubatz & Vera, 2002). The dismissal process for students can be time consuming for faculty and still comes down to faculty opinion versus student opinion (Bemak et al., 1999). The gatekeeping and dismissal process also could present faculty with legal consequences (McAdams et al., 2007). For these reasons, faculty can be reluctant to enforce gatekeeping procedures, especially when it is for a reason other than academic performance (Kerl & Eichler, 2005).

### Methods

Due to the success of the pilot study and a positive reception at a regional conference where initial data was presented, the survey was further developed and deployed online using Qualtrics. In September of 2010, an invitation to participate in the second study was prepared and distributed via email nationally to professors and department chairs of programs accredited by CACREP (Appendix I). The survey developed on Qualtrics contained 14 items. Although the majority of the items were multiple choice, some requested a text response. The participants were asked at the end of the survey to provide any additional information they felt pertained to the topic. The professors and programs interviewed in the pilot study were intentionally omitted from this email distribution.

Initial response to the emails was steady for a period of 5 weeks with a total of 30 responses. As the data collection period was open ended, another set of responses was received in June of 2011. This response period was shorter than the first, lasting only 2 weeks. However, during this much shorter period of time, 24 more responses were received for a total of 54 initiated responses and 51 completed responses outside of the pilot study. Data was then analyzed and compiled from all completed surveys and included in the current work.

#### **Results**

Results show that of 51 total responses, 89% of counseling program coordinators reported that their program does indeed have a gatekeeping policy currently in place. Most of these respondents indicated that they address their gatekeeping policy at new student orientation, via their program handbook, introductory coursework, and even through the application process. Of those who reported that they have no gatekeeping policy in place, 71% indicated they have no reason for not having a policy, and further, 81% of those believe that a gatekeeping policy is needed in their program.

Of the respondents, 85% also indicated that their program has utilized their gatekeeping policy in screening out problematic students. Of these, 41% report that, to their knowledge, the policy has been utilized between three and five times, and 28% reported the policy has been enacted more than five times.

Of the respondents who indicated having a gatekeeping policy currently in place, 48% indicated that the policy was enacted proactively, or in advance of any issues with problematic students. However, of the respondents who indicated having a gatekeeping policy currently in place, 25% reported the policy was enacted retroactively, or as a result of an issue with a problematic student.

This study also included a qualitative section which asked participants if their program had ever graduated a problematic student. Several of the comments revolved around the "fear of legal reprise" for remediating or dismissing a problematic student and in a particular situation "it was thought that (the student's) self-esteem mattered more than protecting the public." Also of concern for the respondents was that "the administration can override (faculty decision for) student dismissal" or that "we don't get much support from administration." One respondent stated that, "at another university, we had a student accused of participating in a rape of an undergrad student and I removed him from his practicum placement at a local high school. The Dean basically said the market would take care of not hiring the student since I was required to give the student a "C." The student was later hired to work in the dorms of an Ivy League school."

It could be said that graduating problematic students in the counseling field is of major concern and could have far-reaching impacts on the community in which the student could eventually serve as a counselor.

### **Discussion**

The results of this study highlight the fact that most counseling programs surveyed do have gatekeeping policies in place and are utilizing them when they see that a student is showing signs of problems with professional competence. This suggests that counselor educators are taking their ethical responsibilities of gatekeeping and protecting the public seriously and are demonstrating to future counselor educators how to be an effective gatekeeper for their students. Although our study did not examine how gatekeeping is being addressed specifically in programs, our respondents indicated that most often, gatekeeping is addressed with students in new student orientation, handbooks, coursework, and throughout the application process.

Also of interest is that 25% of respondents who indicated they do have a gatekeeping program in place stated that the policy was enacted as a result of an issue

with a problematic student. This suggests that programs operating without a policy could open themselves up to legal retribution or threats against due process if the program suggests that a student is unsuitable for the field of counseling. As stated in the literature review, programs must have a protocol in place that students are aware of so that they are informed as to what steps will be taken in the event that remediation is needed. This result also suggests that if a program does not currently have a policy in place, they will need one eventually

Lastly, the qualitative section of the survey regarding counselor educator's thoughts on graduating problematic students was of particular interest. These statements suggest that programs are aware they are graduating problematic students, but do not receive the necessary support from administration, do not have the proper supports in place departmentally, or fear legal retribution both personally and professionally if they are to serve as gatekeepers.

## **Limitations and Implications for Future Research**

This study is not without its limitations. First, and perhaps of most importance, is that the sample size in this study is not large enough to achieve a representative sample of what occurs in all counseling programs across the United States. The data collection instrument is an original design and has not been tested for construct validity or reliability.

However, the implications for future research are many-fold and ripe with potential. First of all, information can be gathered that would help the profession to universally define what constitutes clinical impairment. The present research could also help in determining the common aspects of best practices currently being used at various institutions for designing, implementing, and maintaining a consistent clinical impairment policy which could be universally applicable to master's level counseling programs. Future research also needs to focus on constructing a universal clinical gatekeeping policy that can be utilized at all counseling programs, while maintaining flexibility to meet the demands of the institution's specific needs.

### Conclusion

Although the researchers in this study set out to examine current practices of counseling departments regarding their clinical impairment gatekeeping policies, their history, implementation, and definitions of clinical impairment, it appears there is a need for research leading to a universal definition of clinical impairment. Gatekeeping is at the forefront of this area of interest. As implied previously regarding implications for future research, we are encouraged that research in this area holds the interest and support of counselor educators throughout the profession.

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Note: This paper is part of the annual VISTAS project sponsored by the American Counseling Association. Find more information on the project at: http://counselingoutfitters.com/vistas/VISTAS\_Home.htm

## Appendix I

## **Greetings Faculty!**

We are doctoral students in the Counselor Education and Supervision program at Ohio University. The purpose of this email is to invite you or another appropriate faculty member to participate in a short online survey regarding gatekeeping policies and practices in your department.

Should you agree to participate in this integral aspect of our research, simply follow the link below to our Qualtrics survey. The survey is brief and should only require 10-15 minutes of your time.

http://ohed.qualtrics.com/SE?SID=SV\_4VGRXh8xQ5rjjXS

If you would like to receive information regarding our results, please reply to this email, as Qualtrics will not record any identifying information. Thank you for your time and consideration,

Dorea Glance Golden Fanning Amber Koester William Soto Michael A. Williams, Sr.