

Article 90

Maintaining the Counselor–Client Relationship: Ethical Decision-Making in Online Counseling and Social Networking

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Addendum: This case analysis was written based on the security features of Facebook at the time of writing, winter 2010. Facebook has since changed its security options. It is now possible to manually activate a secure encryption from the user's account settings. This will activate the encryption for whenever the account is used, regardless of location. It is, however, only active on the account that has activated this feature. Other users may not be utilizing this feature and it is not possible to ascertain whether they are, in fact, using a secure login. Since a secure connection cannot be guaranteed, this form of Internet counseling remains an unsecured medium for counseling. Any counselor who engages in Internet counseling must be proficient in the use of computer programs and its services.

Licensed professional counselors obtain licensure with an understanding that, if faced with an ethical dilemma, they will take necessary steps to formulate and implement the most ethically appropriate decision (American Counseling Association [ACA], 2005). This is often easier said than done, since most counselors must also abide by employer regulations and uphold client agreements and expectations; all while continuing to maintain the counseling relationship with the client. To complicate the matter, recent technological advances, such as social networking sites like Facebook, potentially allow counselors to maintain remote relationships or create dual relationships with clients. The authors of this article will discuss these and other ethical issues and technological

barriers, such as substance abuse sponsorship and self-disclosure, presented in the below case scenario and analyzed in the following discussion.

Wanda, a counselor in private practice, finds herself in a complex ethical dilemma. Because one of Wanda's friends posted publicly one of Wanda's private posts regarding Wanda's past addiction experiences and satisfaction with a 12-step addiction program, Tara, the client, has proposed a number of ethically questionable changes in their counseling relationship. First, Tara has suggested that Wanda serve as her 12-step program sponsor, though Wanda was not aware of Tara's addiction status. Second, Tara recommends they continue the counseling sessions through the instant messaging feature of Facebook. These suggestions force Wanda to face further ethical complications, namely issues of self-disclosure, since the two had not mentioned their addiction history thus far, and online ethical expectations, since her Facebook account was evidently not secure. Thus, ethical issues of self-disclosure, dual relationships, and online counseling are the primary issues about which Wanda must decide.

To assist Wanda in effectively navigating this dilemma, the authors propose following the *Practitioner's Guide to Ethical Decision Making* (Forester-Miller & Davis, 1996), which will break down the decision-making process into manageable and reasonable steps. We also suggest Wanda explore other recent ethical decision-making models, such as the Transcultural Integrative Model (Garcia, Cartwright, Winston, & Borzuchowska, 2003) because of its integration of self-awareness and reflection, as well as documentation and evaluation. We will also propose the exploration of preventative measures and societal influences in any future ethical dilemmas that may surface.

Identifying the Problem

Since many ethical dilemmas in the counseling arena are complex, Forester-Miller and Davis (1996) actually suggest straying away from "searching for a simplistic solution" (p. 1). Thus, we propose to break down Wanda's current scenario into the following three areas: confronting self-disclosure issues, balancing dual relationships, and handling technology concerns. Although each issue is important individually, they are interrelated and Wanda's final decision will include all three.

Confronting Self-Disclosure Issues

Once Wanda was aware of her client's knowledge of their shared addiction experience, Wanda began to question whether she should disclose this history with present and future clients. The concern at hand is the fact that Wanda is unsure whether her addiction history will have an impact on the counseling relationship should she not withhold this information. Asking questions such as "Will this serve the best interest of the client?" and "Does this disclosure significantly depart from my usual practice?" will lead her to future steps of this proposed decision-making model (Remley & Herlihy, 2010).

Balancing Dual Relationships

The mental health profession sometimes frowns upon dual relationships; however, "despite some clear clinical and legal risks, dual relationships are not always unethical and unprofessional" (Corey & Herlihy, 1993, p. 4). In this case, two additional

relationship possibilities are present. One possible relationship is Wanda's option of becoming a 12-step program sponsor to Tara. Narcotics Anonymous (2004) refers to a sponsor as "not a social worker...or therapist offering some sort of professional advice" but rather, as "simply another addict in recovery who is willing to share his or her journey through the twelve steps" (p. 1). At first glance, if Wanda and Tara were able to keep separate these roles, the new relationships may be fruitful.

Another possible dual relationship that contributes to Wanda's ethical dilemma is Tara's friend request on Facebook. This social networking site is described as "a gathering spot to connect with your friends and your friends' friends" and to "make the world more open and connected" (Facebook, 2010, About). Similarly, in Wanda's case, her client is asking to extend the present counseling relationship past the professional arena into a more personal realm.

Handling Technology Concerns

To ensure that we can make an ethical decision regarding Tara's request for counseling through the instant messaging (IM) feature of Facebook, we must examine the reason she wishes to use IM counseling as an alternative. While the client reports that IM counseling may better accommodate hectic schedules, it does not speak to the exact reason why she requests a change in service. Assuming the counselor is aware of the legal counseling statutes in both the state of the counselor and the state of the client, it is considered legal to engage Internet counseling in the state of licensure (ACA, 2005, Standard A.12.e; Kaplan, 2006). However, we must look beyond legality to ensure that the problem is not also ethical, professional, or clinical in nature. Ethically, we must inspect if confidentiality will be maintained on the Facebook IM service. Clinically, we must discern if the client can form a positive counseling relationship without any vocal or visual cues from the counselor (ACA, 2005, Standard A.12.g). Professionally, Wanda must insure both that other aspects of Facebook will not distract the client and that she is adept at using technology in a professional manner (Standard C.2.g).

Applying the ACA Code of Ethics

The *ACA Code of Ethics* (2005) clearly states that the counselor should inform the client regarding issues such as "counselors' qualifications, credentials and relevant experience" (Standard A.2.b). Thus, in Tara's counseling situation, it could be favorable for Wanda to disclose her experience as a recovering addict because it could be beneficial to the client. In future situations, it may not be beneficial if she mentions her history as an addict (Standard A.1.a). This will be a judgment call for Wanda to make during future intake sessions.

Roles and relationships with clients are important aspects of the *ACA Code of Ethics* (2005). This addresses not only this particular case's ethical guidelines, but also other relationships, including sexual or romantic interactions. The guidelines are very clear for the latter, but are very vague on nonprofessional relationships, such as those of a sponsor and counselor combination.

Dual relationships should be avoided for the most part, unless the relationship is, "potentially beneficial to the client" (Standard A.5.c). In such cases, "the counselor must document in case records, prior to the interaction, the rationale for such an interaction,

the potential benefit, and anticipated consequences for the client” (Standard A.5.d). Wanda must gain written consent from Tara about their future dual relationship, ensuring that they both understand the expectations and obligations of each.

The ACA Code of Ethics can also address the professional aspect of Wanda’s potential Facebook friend chat option. Standard A.12.g (ACA, 2005) clearly states that websites lacking encryption should not be used for counseling services, mainly due to their lack of privacy, protection and confidentiality for the client; Facebook is one such site (McCullagh, 2008). Furthermore, if the counselor is distracted by his or her other online activities, it may lead to an impairment of the counselor’s ability to assist the client (ACA, 2005, Standard C.2.g). She is required by the code to adjust the interaction. While Facebook IM communication may be incompatible to IM counseling, Wanda may examine other avenues of IM communication to discern if it is a secure and ethical choice for the client. Most importantly, the ACA *Code of Ethics* (2005) does not limit a counselor to face-to-face sessions. He or she must only fulfill the primary responsibility of promoting the welfare of the client (Standard A.1.a). With the advent of the Internet, counselors have at their disposal new tools and features which can be used to provide effective services to clients without face-to-face communication. It is the counselors’ responsibility to utilize these tools with the client’s best interest in mind.

Determining the Nature and Dimensions of the Dilemma

When determining the appropriate steps to take when confronting ethical dilemmas, a professional counselor should take into account moral principles, relevant literature, and the suggestions of colleagues and professional organizations (Forester-Miller & Davis, 1996). Originally developed by Kitchener (as cited by Forester-Miller & Davis, 1996), the five moral principles that form the basis of our counseling ethical standards, are as follows: autonomy, nonmaleficence, beneficence, justice, and fidelity. Applying these principles, along with the suggestions of recent research and supervisors, will lead Wanda to make the most effective ethical decision.

Considering Moral Principles

Self-disclosure, as stated previously, should only be engaged in when there is an inherent benefit to the client (ACA, 2005, Standard A.2.b). Thus, the moral principles of beneficence and nonmaleficence are instrumental in this decision. Would the act of self-disclosure—of Wanda’s addiction history, in the case—do no harm to and prevent harm for the client? This is a complicated question, and only becomes more difficult once self-disclosure is engaged (Remley & Herlihy, 2010). Wanda should consider how her self-disclosure would eventually affect the moral principles of justice and fidelity. In other words, she should consider how any self-disclosure might affect her ability to treat Tara as she should be treated in respect to other clients’ treatment, as well as her ability to honor any commitments she has made as the counselor in the relationship (Forester-Miller & Davis, 1996).

Becoming a Facebook friend with, and a 12-step sponsor for, a client could challenge the client’s autonomy, since it would open the door to dependence on the counselor. Likewise, by putting aspects of a counselor’s private life on a social networking site, the counselor-client relationship could be damaged. As far as justice is

concerned, if Wanda were Tara's sponsor, she may have to consider providing similar services to future clients. Finally, to promote fidelity to the client, it would be better to remain the counselor only, instead of bringing another role into the relationship. If Wanda were to become Tara's sponsor, Wanda is making a promise to Tara to be present and available outside of her expected counseling commitments (AA, 2005).

In regard to IM counseling, the three moral principles that remain transparent are autonomy, justice, and fidelity. Autonomy is maintained because the counselor and client each remain independent and retain much of the counseling relationship that was once possessed. Justice is maintained by using technology that is free and available to anyone with access to the Internet. Lastly, IM counseling provides loyalty to the client by continuing to maintain the promise of working to better the client in a new way. The moral principles that must be taken into further consideration are nonmaleficence and beneficence. It must be ascertained whether IM counseling can be harmful to clients or whether the change can provide some improvement to the client's life. With the advancement of technology, there will always be new electronic tools that may be useful to counselors and clients alike. It is the responsibility of the counselor to investigate and see if these tools can assist their clients ethically.

Reviewing Relevant Literature

Although the current ACA *Code of Ethics* (2005) proposes that self-disclosure could be seen as appropriate when it is beneficial to the client's well-being, recent research disputes this commonly held thought. Remley and Herlihy (2010) report on research which supports that when the lines of the counseling relationship are blurred, that relationship is likely to "erode gradually over time" (p. 209). When taking into account various diversity considerations, such as how self-disclosure is seen in different cultures, the self-disclosure issue becomes only more complex. For example, some Asian clients may see self-disclosure as a violation of values, since it comes from a non-familial member (Remley & Herlihy, 2010). In other cultures, however, self-disclosure may be beneficial to the relationship and provide an opportunity for growth and cohesion.

In the present case, the client is requesting dual relationships by becoming a Facebook friend and by becoming an AA sponsor. It is up to the counselor and the local ethics board to interpret whether or not these relationships will be beneficial to the client. In the case of sponsorship, it is important to express to the client the difference between the role of a counselor and the role of a sponsor. Many people who attend these meetings are professionals, but dissertation research by Hollander (2004) shows that surveyed substance abuse counselors find dually serving as a sponsor "never ethical" to "ethical under rare conditions" (p. 127). According to Herlihy et al. (2006), "it is important that counselors clearly communicate to clients that they will not act in a professional role as a member while attending a 12 step meeting" (p. 161). Both relationships can be very demanding; therefore, according to research, counselors are strongly encouraged to avoid dual engagements with clients (Powell & Brodsky, 1993).

The remaining problem that exists after applying the ACA *Code of Ethics* to the IM counseling question is how to form a productive and effective form of IM therapy that assists the client, ensures confidentiality by using encryption, and avoids any aspect of impairment that may limit success. According to Haberstroh, Duffey, Evans, Gee, and

Trepal (2007), online IM counseling resembles journaling in a large way and can examine both cognitive and emotional qualities of the client. In another study by Cohen and Kerr (1998), students seeking counseling for anxiety reported equal success in IM communication compared to in-person sessions. In this new world of therapy we can see that online counseling is an effective tool for some clients with certain goals and behaviors. In some cases, online counseling can meet the need for beneficence as stated by the code of ethics.

When engaging in any form of online counseling, technological barriers exist between the counselor and client. For example, both must be computer proficient to avoid technical issues. As with any technique or intervention, the counselor must have knowledge of how to use the tool whether it be an intervention or a online program to facilitate counseling. Haberstroh et al. (2007) states, "...Online counselors need to evaluate their client's level of technical competence" (p. 279). In addition, without non-verbal cues from the client, the counselor's ability to make a comprehensive assessment of the dynamics in the session, in addition to assessing the severity of clients' concerns, is limited (Haberstroh, Parr, Bradley, Morgan-Fleming, & Gee, 2008). Overall, we can see that this can be an effective and helpful counseling relationship if the client and counselor are able to take the appropriate content from the text interaction while understanding the limits of this type of communication.

Consulting Professional Colleagues and Organizations

In any counseling situation, it is important to engage in collegial consultation or official supervisory discussions (Young, 2009). Especially in Wanda's current ethical dilemma, it is important to hear another professional's take on any presenting facts. Wanda should contact any available source of consultation she may have, taking into account the confidentiality of her client and the situation. Furthermore, Wanda should consider whether the addiction program offers an ethical code of some sort, which may preclude her from engaging in the sponsoring relationship. Any additional comments about her future actions should be fully considered.

Generating Potential Courses of Action

Since Tara is actually already aware of Wanda's addiction history, the potential course of action related to self-disclosure reflects whether to disclose further details to Tara, which may or may not help in their counseling session discussions. Wanda is also considering her future clients who may benefit from the knowledge gained from the addictive past. In these cases, she can choose to disclose the information to every client, no client, or to only relevant and interested clients.

One potential course of action concerning Tara's friend request on Facebook could be declining the invitation; another is accepting the invitation. The third option could be becoming friends with the client but limiting the information the client can see through filtering. In regards to the invitation to become Tara's 12-step program sponsor, Wanda could accept the invitation and remain her counselor, accept the invitation and discontinue counseling by referring to another, or decline the invitation and assist in the search to find a more appropriate sponsor.

We can see that IM counseling can be effective to clients if the limits are recognized and the client is aware of those limits. We can also see that it affects the counseling relationship by removing verbal and visual cues that counselors use to analyze the client's meaning behind his or her words. Therefore, it is important to stress to the client that with the change of the counseling medium, so too will there be a change in the relationship due to the content exchanged. In addition, while Facebook does not provide any type of encryption in their online communication, Skype does provide encryption (Skype, 2010). It also has an IM function, video chat function, and audio function. This gives options of a face-to-face video chat, telephone chat, or the IM chat that the client has requested. Wanda has actually conducted a Skype counseling session in the past, so she could incorporate this into her sessions with Tara. With proper investigation, an online tool can be found that not only provides a chat function, but also an audio function that could facilitate phone therapy, and a video function that can provide the counselor with a client's nonverbal cues in a manner consistent with traditional types of therapy.

Considering Potential Consequences of Options and Choosing Courses of Action

Considering Potential Consequences

When considering whether to disclose details of her addiction history, Wanda should determine whether her input would benefit the client's situation. A client could assume that, since Wanda has recovered from her addiction, his or her outcome will be similar. However, each person's story is, of course, different, and a client should never assume his or her outcome based on another's. On the other hand, hearing another addiction story with a positive ending may help a client to overcome his or her own struggles, giving him or her a sense of hope and support.

By accepting the client's requests for sponsorship and Facebook friendship, Wanda could validate the client's needs to connect personally, create a minimal power differential in the relationship, and promote a more positive interaction outside of the counseling relationship (Hollander, 2004). Wanda would have to constantly monitor what she posts on Facebook and discloses in the role of sponsor, which could be very taxing. Facebook's Privacy Policy (2010) actually states that even once a profile is completely deleted, past posted information may still be accessible through others' profiles; furthermore, one creates an account with the understanding that "information might be copied or shared with others" (Privacy Policy). Should Wanda accept, she would have to ensure that her multiple roles—friend, counselor, and sponsor—do not compromise confidentiality or interfere with the client's wellbeing and overall treatment plan. If Wanda were to decline both the friend request and becoming Tara's sponsor, she would have to spend session time discussing an appropriate counselor-client relationship and validate Tara's wish to connect on a more personal and therapeutic level. In addition, in order to prevent feelings of abandonment and other negative interpretations, time must be spent explaining the reasons for the rejection. Contrastingly, Wanda would have much clearer boundaries with the client. This would also allow the client to meet the virtue of autonomy by venturing on her own to find a sponsor, possibly granting a sense of empowerment to the client.

IM counseling affords the absence of verbal and non-verbal cues, which can slow down the progress of the session. The counselor would have to set personal limits

regarding what can go on during an IM counseling session, as stated by Haberstroh et al. (2008). The counselor must also be aware that confidentiality on the Internet must be maintained to the best of the counselor's ability, as it is a prime concern of clients who use online counseling, as reported by Young (2005).

Determining a Course of Action

Once Wanda has explored all of her options and discussed potential benefits and consequences with the client and with other professionals, she will be able to come to the most appropriate and ethically correct conclusion. Since the particular self-disclosure is relevant to Tara, we propose that Wanda disclose a limited and closely monitored amount of her addiction history. In future client relationships, she should disclose this limited information only if it is beneficial and relevant to the client's therapy. In regards to forming dual relationships with Tara, Wanda should decline both invitations, and more importantly, discuss these choices and the ramifications for the decision with Tara. Finally, Wanda should not engage in Facebook IM counseling due to its lack of encryption; however, she may explore Skype counseling and the multiple counseling venues the software provides. We strongly suggest that Wanda seek outside supervision throughout the entire transitional period, in order to gain support for her decisions and any future opposition she may find because of them (Hollander, 2004).

Evaluating, Documenting, and Implementing the Selected Course of Action

Evaluating the Course of Action

Upon the decision to decline both relationships, while engaging in appropriate self-disclosure and possible online Skype counseling, Wanda should run these options through three tests developed by Stradler (as cited by Forester-Miller & Davis, 1996): justice, publicity, and universality. First, Wanda must determine whether she would treat other clients in the same manner. It is the belief of the authors that she should self-disclose if appropriate, Skype if appropriate, and discourage dual interactions, which may blur the lines of the counseling relationship. Secondly, if Wanda were to face public reporters, we believe she would be able to appropriately represent the counseling profession, while maintaining her own personal beliefs and values. Finally, because we have determined our suggestions to Wanda based on current decision-making models and research, we would highly recommend the same results to a counselor in the same situation.

Documenting the Course of Action

Documentation in the counseling profession is of utmost importance. In the present case, documentation should be used in order to appropriately account for all decisions made, including how Wanda prepared the client for upcoming transitions, as well as how she confronted the client with the rejection of dual relationships. Because these ethical issues are quite controversial and yet to be firmly agreed upon in the counseling profession, documentation is key in order to prevent any future questioning of Wanda's professionalism and ethical appropriateness (Remley & Herlihy, 2010). The *ACA Code of Ethics* (2005) states that when self-disclosure, dual relationships or online counseling may occur, the counselor must document in case records (Standard A.2.b).

Standard A.2.b (ACA, 2005) also mentions that discussions prior to the change, rationales for any decision, potential benefits and consequences, and post-intervention comments must all be recorded in accessible and appropriate case notes.

Implementing the Course of Action

It is important to speak with the client to ensure he or she has the proficiency required to handle online communication and can handle more complex communication capabilities. In the present case, this will provide Wanda with the information she needs to continue to be an effective counselor and Tara the freedom she has requested to help meet her hectic scheduling. Becoming confident in a chosen plan is as easy as doing the prep work for the sessions as well. Familiarizing oneself with an online program and understanding its strengths and limitations can provide comfort over the decision one has made. Prepping the counselor's surroundings before the sessions can also add a sense of professionalism and place the counselor in the correct mind set to provide therapy. In addition, by keeping communication open with the client, the counselor can insure accountability by checking on the quality of the new form of therapy and ensure that it is meeting the client's expectations and needs.

When faced with ethical dilemmas, counselors should reference the American Counseling Association's *Code of Ethics* (2005) for guidance. This code, along with recent research and policies written on relevant topics, has helped the authors to determine the best course of action for Wanda. In the end, her decision will affect not only her relationship with the present client, but also her relationships with future clients, and her view of the profession as a whole. It is our hope that this ethical dilemma is simply a learning experience for Wanda.

Because Wanda runs a private practice, she is forced to face decisions alone and must rely on her own decision-making skills in future ethical dilemmas. Therefore, Wanda should take necessary steps to ensure her readiness in handling these situations. For example, she has grappled with disclosing her addiction history to future clients, and she should explore whether this information would be useful for future clients to know. Perhaps she can include substance abuse questions on her intake questionnaire and disclose her history only if it is relevant to the client. Also, being aware of her social networking site privacy and all that that entails is of utmost importance when preventing this from happening again. Wanda will most likely be faced with technological dilemmas in the future, as we all expect to be, so she should prepare herself with the knowledge and tools available. We believe that Wanda can come out of this ethical dilemma unscathed, with more professionalism and knowledge under her belt. She will also have learned new ways that the Internet can have an effect on her practice and become better prepared for the dangers as well as more open to the benefits that it can provide.

When Tara, the client, approached Wanda with her proposal for IM counseling and 12-step sponsorship, Wanda was actually already facing dilemmas of her own. Unbeknownst to Wanda, a past Facebook status was reposted for all to see, even her current clients. Although Wanda had taken necessary steps to ensure her Facebook privacy, there are ways around this, and, as we have shown, there is no guarantee for this protection. Once this leak occurred, Wanda faced decisions of self-disclosure, dual relationships—Facebook “friending” and 12-step sponsorship—and Internet IM counseling. To decide on her next steps to take, we proposed the use of Forester-Miller

and Davis' (1996) *A Practitioner's Guide to Ethical Decision Making* which walked her through the exploration of the problems, consideration of all options, and implementation and evaluation of her decisions. To conclude, we hope that Wanda's decision will serve the best interest of the client, help to maintain and grow the counseling relationship, prepare her for facing future ethical dilemmas, and promote discovery of new tools in the digital world which could prove useful in her practice.

References

- Alcoholics Anonymous. (2005). *Questions and answers on sponsorship*. New York, NY: Alcoholics Anonymous World Services Inc.
- American Counseling Association. (2005). *ACA Code of Ethics*. Alexandria, VA: Author.
- Corey, G., & Herlihy, B. (1993). Dual relationships: Associated risks and potential benefits. *Ethical Issues in Professional Counseling*, 1(1), 1-14.
- Facebook. (2010). *About facebook*. Retrieved from <http://www.facebook.com/#!/facebook>
- Facebook. (2010). *Privacy policy*. Retrieved from <http://www.facebook.com/policy.php>
- Forester-Miller, H., & Davis, T. (1996). *A practitioner's guide to ethical decision making*. Alexandria, VA: American Counseling Association.
- Garcia, J., Cartwright, B., Winston, S., & Borzuchowska, B. (2003). A transcultural integrative model for ethical decision-making in counseling. *Journal of Counseling & Development*, 81(3), 268-277.
- Haberstroh, S., Duffey, T., Evans, M., Gee, R., & Trepal, H. (2007). The experience of online counseling. *Journal of Mental Health Counseling*, 29(3), 269-282.
- Haberstroh, S., Parr, G., Bradley, L., Morgan-Fleming, B., & Gee, R. (2008). Facilitating online counseling: Perspectives from counselors in training. *Journal of Counseling and Development*, (86), 460-470.
- Herlihy, B., Corey, G., Bludworth, J., Borders, L., Cain, H., Caldwell, L., et al. (2006). *Boundary issues in counseling: Multiple roles and responsibilities (2nd ed.)*. Alexandria, VA: American Counseling Association.
- Hollander, J. K. (2004). *Beliefs of board certified substance abuse counselors regarding selected multiple relationship issues*. (Doctoral dissertation). Retrieved from PsycInfo.
- Kaplan, D. (2006). Ethical use of technology in counseling. *Counseling Today Online*. Retrieved from <http://www.counseling.org/Publications/CounselingTodayArticles.aspx?AGuid=421e99b9-ec6c-4f46-a6c4-4f8b6101275a>
- McCullagh, D. (2008). *How safe is instant messaging? A security and privacy survey*. Retrieved from <http://newsblaze.com/story/20100530113611tm75.nb/topstory.html>
- Narcotics Anonymous. (2004). *Sponsorship, revised*. New York, NY: Narcotics Anonymous World Service Inc.
- Powell, D. J., & Brodsky, A. (1993). *Clinical supervision in alcoholic and drug abuse counseling: Principles, models, methods*. San Francisco, CA: Jossey-Bass.
- Remley, T., & Herlihy, B. (2010). *Ethical, Legal and Professional Issues in Counseling* (3rd ed.). Boston, MA: Pearson Education Inc.

- Skype. (2010). *What type of encryption is used?* Retrieved from <https://support.skype.com/faq/FA145/What-type-of-encryption-is-used?frompage=search&q=encryption>
- Young, K. S. (2005). An empirical examination of clients' attitudes towards online counseling. *Cyber Psychology & Behavior*, 8, 172-177.
- Young, M. E. (2009). *Learning the art of helping: Building blocks and techniques*. Upper Saddle River, NJ: Pearson Education Inc.

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