

Mediating Secret Disclosure in Family Counseling:

The Case of Elisa

Lawrence C. Halby, Casey J. Kelly, Lyndsey M. Klemme & Audrey L. Miller

Selection of Ethical Decision Making Model

The American Counseling Association (ACA) Code of Ethics states, “When counselors are faced with ethical dilemmas that are difficult to resolve, they are expected to engage in a carefully considered ethical decision-making process, consulting available resources as needed. Counselors acknowledge that resolving ethical issues is a process; ethical reasoning includes consideration of professional values, professional ethical principles, and ethical standards.” (ACA, 2014, p. 3). In choosing a ethical decision making model (EDMM) the ACA advises counselors to use a credible model that can stand up to public scrutiny (ACA, 2014). There are several ethical decision making models; Nash (1981), proposed a 12 question ethical decision making model. Many medical practitioners use The Realm-Individual-Process-Situation (RIPS) model (Swisher, Arslanian & Davis, 2005). The military uses The United States Department of Defense (DOD) Ethical Decision Making Plan (DOD, 1999) and A Practitioner's Guide to Ethical Decision Making (Forester-Miller & Davis, 1996).

In evaluating Nash’s 12 Question Model and the DOD Model, both were primarily concerned with business ethics based in legality and allegiances. Neither model outlined the responsibility of the practitioner to respect the dignity and welfare of a client based on a set of moral principals. The RIPS model has four steps: (1) recognize and define the ethical issues, (2) reflect, (3) decide the right thing to do, and (4) implement, evaluate and re-assess (Swisher, Arslanian & Davis, 2005). The model includes ethical decisions in three realms the individual, organizational and societal, but the concept of implementing your final decision and then re-assessing it does not fit well into the ideas of the counseling profession. Ultimately, we selected the Forester-Miller & Davis EDMM developed in 1996 to guide our process.

A Practitioner's Guide to Ethical Decision Making developed by the ACA Ethics Committee (Forester-Miller & Davis, 1996) was chosen for its direct application of the ACA Code

of Ethics. The EDMM implements Kitchener's (1984) five moral principals of virtue ethics, that includes the principals of autonomy, non-maleficence, beneficence, justice and fidelity as a cornerstone of the decision making process. In addition Forester-Miller and Davis' (1996) model includes consultation with experience professional colleagues and the addition of a self-evaluative process regarding the final decision. The model outlines seven steps for decision making: 1) identify the problem; 2) apply the ACA Code of Ethics; 3) determine the nature and dimensions of the dilemma; 4) generate potential courses of action; 5) determine the possible consequences of all options and determine a course of action; 6) evaluate the selected course of action; 7) implement the course of action (Forester-Miller & Davis, 1996).

Step 1: Identify the Problem.

This case study presents an ethical dilemma in which a counselor must effectively manage the disclosure of a secret during a family counseling session. Elisa, the therapist must decide how she can most ethically work with the family both immediately following the disclosure as well as in later sessions. Gina Roberts initially sought out Elisa for support due to conflicts between her son Eric (13) and his cousins Joel and Kyle (10 and 11, respectively). The boys go to school together and Gina reports that "serious conflicts" have arisen both at school and at family functions. Prior to beginning therapy, in a phone conversation, Elisa is informed by Gina that Joel and Kyle are actually Gina's biological children, Eric's biological brothers. The children do not know this information but when they were young (11 months and 2 years), Gina's aunt and uncle adopted the boys, under the pretense that Gina never tell them the truth. Three weeks into therapy, Eric discloses to Joel and Kyle that they are actually his brothers. The boys are distraught and ask Elisa for clarification, wanting to know if their parents have been "lying to us all this time". At

this point Elisa is faced with an ethical dilemma. She must decide how to most effectively handle the disclosure while maintaining the safety of her clients.

Step 2: Apply the ACA Code of Ethics.

One of the main purposes of the ACA Code of Ethics is to “[serve] as an ethical guide designed to assist members in constructing a course of action that best serves those utilizing counseling services and establishes expectations of conduct with a primary emphasis on the role of the professional counselor.” (ACA, 2014). All ethical codes of professional counseling require informed consent, and many state practice laws mandate it (Dasenbrook and Walsh, 2005). We assume Elisa has abided by ACA code A.2.a on informed consent, and that she reviewed her informed consent form with all family members at the first counseling session. Since the family is now three weeks into counseling, we also assume all family members have by this point agreed and signed the informed consent document. Code A.2.a states that, “clients have the freedom to choose whether to enter into or remain in a counseling relationship...” (ACA), and this case study specifically stated that Elisa was informed of Kyle and Joel’s adoption status prior to the establishment of the therapeutic relationship. If Elisa handles the disclosure of secrets pertinent to family counseling as most family and marriage counselors do, she likely informed Gina that such a large secret would at some point need to be disclosed if it would have bearing on the therapeutic process. If this was made known to Gina and the Brinks, then by their entering the therapeutic relationship and signing the informed consent, Elisa’s liability regarding Eric’s disclosure is lessened. However, since we don’t know what was written in the informed consent, we must look further in the code of ethics.

We find from B.4.b that in this scenario, all six family members are, together, considered “the client”, and must therefore be treated as a unit. Of similar consideration is ACA code B.5.b where “counselors work to establish, as appropriate, collaborative relationships with

parents/guardians to best serve clients.”(ACA, 2014). Elisa must take care when working in a “collaborative” manner with the Brinks and/or Gina since they are clients themselves. Had the boys been brought in for counseling rather than the entire family, the dynamics would be different, but since the family unit is the identified client, it is important that Elisa refrain from developing the type of relationship with the parents’ that involves the exchange of private information. This leads us to ACA codes B.1.c, B.1.d, B.4.a, and B.4.b. Together, these codes highlight the significance of confidentiality and remind us that Elisa should have discussed with the entire family the parameters, limitations, and situations in which she would breach confidentiality (ACA 2014). As fore mentioned, without any specific information regarding Elisa’s informed consent and disclosure statement, it will be assumed that she covers, at least generally, topics related to disclosure on her part. When counseling families, secrets are often explicitly dealt with in disclosure statements, and it appears that the most common policy counselors take is one of discouraging secrets between counselor and one/several family members. In other words, more often than not counselors maintain that keeping secrets in counseling is detrimental to the therapeutic process, and therefore retain the right to disclose secrets shared with them if they are relevant to the issues at hand.

From the moment this dilemma is presented to her, Elisa needs to consider ACA Code A.9.b. where, “counselors take reasonable precautions to protect clients from physical, emotional, or psychological trauma.” (ACA, 2014). In addition, ACA Code A.4.a. states that a counselor must also “avoid harming their clients, trainees, and research participants and to minimize or to remedy unavoidable or unanticipated harm.”(ACA 2014). Elisa will have to make the most ethical decision that is not necessarily beneficial to everyone in the moment, but does the least amount of damage to the group overall. Further, it is important that she follow up with the family on this issue to ensure that as the new information sets in, the family members as individuals and as a unit

are not experiencing any dangerous reactions.

Lastly, ACA Code A.8 cites, “If it becomes apparent that the counselor may be called upon to perform potentially conflicting roles, the counselor will clarify, adjust, or withdraw from roles appropriately.” (ACA, 2014) Furthermore, B.2.e. states that “clients are informed before confidential information is disclosed and are involved in the disclosure decision-making process.” This is difficult to assess. This situation seemed to happen unexpectedly, and we assume there was no time before this moment that Elisa and the Brinks discussed the possibility of this dilemma.

Step 3: Determine the nature and dimensions of the dilemma.

Prior to generating potential courses of actions, it is necessary to determine the nature and dimensions of the dilemma. According to Kitchner (1984), aspects that must be contemplated in this step are identification of the stakeholders (Elisa, Gina, Mary, Kevin, Eric, Kyle, and Joel), and consideration of the moral principles of autonomy, nonmaleficence, beneficence, justice, and fidelity. Consideration of current professional standards, as well as applicable community standards, and the clients’ cultural values will be important at this stage moral principles can often be interpreted in different manners and proper application of them is arguably to be determined on a situational basis.

When taking the perspective of the parents in this scenario, it appears as though the principles of nonmaleficence and beneficence are paramount. When arranging the adoptions of Kyle and Joel, Mary and Kevin insisted that they would only participate in the process if Gina agreed to never tell the boys that she was their real mother, presumably in an effort to prevent any stress from coming to the boys, an act of nonmaleficence. Further, the act of adopting Kyle and Joel in the first place was an act of beneficence on the part of Mary and Kevin, as was Gina’s act of giving them up for adoption as she felt that she would not be able to promote the most good in their lives. It is important for Elisa as a counselor to remain mindful of what the adoption process

meant to Mary, Kevin, and Gina, and that they may view the raising of Kyle and Joel by the Brinks as a delicate situation which does the boys good only so long as they feel that they are wholly Mary and Kevin's sons and not as though Gina gave them up. It is reasonable to assume that autonomy is important to Mary and Kevin in this situation insofar as they wish to follow their "self-chosen plan" (Beauchamp & Childress, 2013, p. 101).

Many theories of autonomy cite two essential conditions for autonomy: liberty, or "independence from controlling influences", and agency, which is the "capacity for intentional actions" (Beauchamp & Childress, 2013, p. 102). Since Kyle and Joel were well below the age of consent at their time of their adoption, and remain below that threshold at the time of counseling, as their legal guardians Mary and Kevin have every legal right to make decisions on their behalf. Ethically however, Elisa would do well to consider what detrimental effects all three boys may experience as the result of having such a large secret kept from (Kyle and Joel) and by them (Eric). In a longitudinal study that followed adolescents for six months, Frijns and Finkenauer found that keeping a secret contributed to a myriad of "psychosocial problems, including depressive mood, low self-concept clarity, low self-control, loneliness, and poor relationship quality" (2009, p. 145). When one considers that the primary reason the two families have entered counseling is because of the increasing discord amongst the three boys, Elisa may be doing a great justice to Eric, and likewise engaging in nonmaleficence, by advocating for the sharing of the secret of his brothers' adoptions.

Returning to the principle of autonomy, "children provide a good example of the continuum running from being in control to not being in control" since they are arguably not "free of controls exerted...by external sources" (Beauchamp & Childress, 2013, p. 104). Even more critical to Beauchamp and Childress' argument for autonomous behavior is understanding, and they clearly cite immaturity as a condition that limits understanding (p. 104). At the age of 13,

Eric has entered the developmental stage of adolescence in which autonomous action often becomes a matter of push and pull between child and caregiver because although they may still lack the necessary cognitive capacities (e.g. foresight, delay of gratification) to make some wholly informed decisions, adolescents do possess an ever increasing desire to be the sole determinants of their lives. In an effort to behave with beneficence toward Eric, Elisa should consider how much autonomy she should grant him in the counseling process, and perhaps extend that consideration to Kyle and Joel as well.

Since Gina was the one who initially sought Elisa's counseling services and she informed Elisa of the circumstances under which Kyle and Joel were adopted, fidelity is a principle worth considering. Although it was prior to entering the counseling relationship, Gina did show a degree of trust in Elisa and her ability to maintain some confidentiality when she disclosed the Brinks' insistence that the boys' adoption be kept secret; the way in which Elisa handles Joel's question will very likely either serve to bolster her trustworthiness or deplete it in the eyes of Gina, Mary, and Kevin. As previously discussed, considerations of nonmaleficence and beneficence toward the children is of principle concern for Elisa, but she must also be cognizant of behaving in a manner that upholds the same principles for the adults.

Justice is a principle that will perhaps be overarching in the resolution of this dilemma. In ethical context the principle of justice may be more difficult to define than those discussed prior, but Corey, Corey, Corey, and Callahan (2011) define it simply as "to be fair by giving equally to others and to treat others justly" (p. 18). Application of this principle in particular calls for the fore mentioned consideration of what course of action will be nonmaleficent and beneficent to each member of the family, while granting autonomy for each individual.

Step 4: Generate potential courses of action.

Having considered the nature and dimensions of the dilemma, the next step is to generate potential courses of action. This case presents a particularly difficult situation, since Elisa must make at least an initial decision regarding how to proceed while the family is still in session. There are several ways in which she could react to Eric's disclosure, including: 1) not responding to Joel's question and observing how the family interacts in response to the disclosure, 2) confirming that Kyle and Joel are adopted, 3) denying that Kyle and Joel are adopted, 4) pausing the session and seeking consultation from a colleague, 5) asking the boys to leave so that she can speak with the adults, 6) separating the family units to address each separately, 7) asking the Brinks how they would like to proceed, 8) addressing Eric to assess why he made the disclosure, 9) turning to Kyle and Joel to gain insight into how they have been effected by the disclosure, or 10) doing a round with the entire family that would encourage each member to express what they are experiencing in light of the disclosure.

Step 5: Determine the possible consequences of all options and determine a course of action.

Deny: Elisa could deny knowing and try to move the session forward; this would allow the parents to address the subject at a different time. The benefit would be that the counselor would not take responsibility for holding a secret from the children or force the parent to explain themselves in the moment with tensions high. The potential consequences of deflecting the subject are that the children may not be able to get past the subject and shut down or act out. If the statement is later confirmed there could be a loss of trust in the counselor from the children. The most severe consequence is if the subject is dropped and the family keeps the boys relation to their mother secret, the counselor is causing potential harm to the boys later if the counseling relationship ends without the family addressing the subject.

Pause or end session and seek consultation: Elisa could pause the session or if it is close to the end wind down the session without confirming or addressing the subject. During the break in the session Elisa can consult with colleagues before bring the subject back to the family. The benefit of doing this is to allow some time for the family and her to cool down their emotions; while Elisa evaluates her options with peers prior to handling the situation. A potential consequence is if ending or pausing the session leaves the family hanging on such an emotional topic, this could cause more separation between family members and damage the children's trust in Elisa and the counseling process.

No response; observe family interactions: Elisa could choose to not respond to the question and instead wait to see how the family handles it. Ethically it may be inappropriate for Elisa to comment on if the boys were adopted or not, in choosing not to respond Elisa does not break confidentiality. By not confirming or denying the statement Elisa would be able to further evaluate the situation and obtain more information about how the family would like to handle the disclosure. The downside to this is if Elisa chooses not to confirm or deny the allegation, she may risk losing the trust of the boys; she may even lose the trust of the adults. Additionally the situation may continue to escalate.

Confirming and placing responsibility on parents: Elisa could confirm that the allegation is true. This would place responsibility on the parents, ultimately holding them accountable for the secret. Elisa could then facilitate a discussion around the secret and help the family process the disclosure. A potential consequence of this course is the violation of confidentiality, which could lead to a total loss of trust by the adults. Confirming the statement may also escalate the situation and Elisa could risk losing control of the group.

Addressing family units separately: The family can feasibly be split into two familial units consisting of Mary, Kevin, Kyle, and Joel Brink, and Gina and Eric Roberts. By asking one of the

familial units to leave the room and addressing them separately, the tension in the room and erratic nature of the disclosure by Eric is interrupted. This would give the parents an opportunity to calm their children, and for Elisa to discuss pertinent issues with each family while clarifying some information as well. For example, when speaking with Gina and Eric, Elisa can learn how long Eric has known of the adoption and under what circumstance (i.e. did Gina tell him, does he remember life with his brothers, did he over hear it, etc.), as well as what it means to Eric that Kyle and Joel are his brothers. When with the Brinks, Elisa may be able to use the situation in a therapeutic manner, giving Mary and Kevin the opportunity to disclose the adoption to the boys in their own words and assessing how each one of them reacts to Eric's outburst.

Ask the boys to leave so parents can be consulted: Since the boys are all underage, and because Elisa is aware of the Brink's desire for the adoption to remain confidential, one option would be for her to ask the boys to leave the room in order to ask the three parents how they want to proceed. This would respect the authority the parents' have in making such a big decision about their family dynamics, and would likely foster a sense of trust in the parents. However, by sending the boys out Elisa risks damaging her relationship with them, making them feel invalid and unimportant. Also, since Eric clearly made the disclosure in a moment of intense emotion, isolating the three boys may breed further conflict. Eric would be unsupervised with the younger boys and free to tell them whatever he wanted regarding their adoption

Deferring to the Brinks: Another option for Elisa is to simply ask Mary and Kevin Brink how they would like to proceed since they are the primary ones responsible for the adoption being kept a secret up to this point. Their expressed desire for confidentiality at the time of adoption should not be overlooked, and by assessing their reactions to Eric's disclosure (e.g. anger, shock, resigned, acceptance) Elisa may be able to decide how to proceed without having to flat out ask them their opinion of the best course of action.

Addressing Eric: Eric is clearly experiencing some frustration, so finding out his motives for disclosing the adoption and how he feels having gotten it off of his chest would likely provide Elisa with some direction while validating Eric. This may be done either with or without the rest of the family in the room. Eric may feel more comfortable opening up with just Elisa or Elisa and Gina in the room, and the Brinks may appreciate not having Kyle and Joel further exposed to Eric's catharsis.

Address only the younger boys, while the rest of the family leaves the room: The first consideration here is that should Elisa ask the parents to leave, she would be splitting up the client since it has been decided that "the client" is the family. Elisa may lose the trust of the adults by asking to hold council with the boys alone. Also, the possibility of triangulation becomes more relevant as Elisa chooses to spend time with one part of the whole family unit. If discord is to follow Eric's disclosure, it would likely be more beneficial for all pertinent parties to be present.

Doing a round with everybody: Should Elisa ask each individual to share how they're feeling following Eric's disclosure, everyone would have a chance be heard. This would take the immediate pressure off of Elisa, allowing her to identify the stance that the adults decide to take (i.e. whether they want to tell the boys the truth or not). However, if any of the adults deny what Eric has stated, this may cause more conflict, raise tension, create confusion, and push the family further from any resolution. This could also alienate Eric.

Step 6: Evaluate the selected course of action.

After outlining the potential courses of action, we decided that to best serve her clients Elisa should combine several steps. She will pause the session and clarify her role before then encouraging the children to bring their concern to their parents. Elisa will check in with each member of the family before ending the session and developing a plan for the future. Elisa's first step is to briefly pause the session. The information that Eric disclosed is highly charged and

emotional in nature. The ACA Code of Ethics states that counselors must, “avoid harming their clients, trainees, and research participants and to minimize or to remedy unavoidable or unanticipated harm.”(ACA 2014). In pausing the session, Elisa has an opportunity to halt the momentum behind Eric’s disclosure, minimizing the unavoidable pain that comes with the disclosure. This is also an opportunity for Elisa to validate the enormity of the disclosure, which will help the family members to feel safe and understood.

Elisa will then clarify her role in the counseling relationship. Elisa was informed of the adoption prior to working with the entire family. Eric’s disclosure and the question asked of her from the younger boys puts her in a situation where she is performing conflicting roles as both the counselor and a secret-keeper. The ACA Code of Ethics states that, “If it becomes apparent that the counselor may be called upon to perform potentially conflicting roles, the counselor will clarify, adjust, or withdraw from roles appropriately.” (ACA, 2014) Elisa will explain her role as a therapist and clarify that she works with the family as a unit. She will then suggest that the boys address the concern with their parents. According to the ACA Code of Ethics, “counselors work to establish, as appropriate, collaborative relationships with parents/guardians to best serve clients.”(ACA 2014). In asking the children to bring their concern to their parents Elisa is encouraging a collaborative familial relationship. Because this potential confrontation is occurring in the therapeutic setting, Elisa can work with the family to ensure the safety of all members as they process the disclosure.

Next, Elisa should do a round with the family. Here, she is able to get an idea about what everyone is thinking and feeling. The round may cause more engagement within the group as well (Scimmel and Jacobs, 2014). Following the round, Elisa should come up with a future plan with the family. We suggest giving homework that asks each family member to consider some important concepts like what family means to them and what their family members do for them in

life. Last, we strongly suggest that Elisa seek professional consultation in order to gain knowledge, ability, self-assurance, objectivity, and interpersonal relationship skills to make a decision on the specific issue (Knoff, 1988). The decision to consult is also supported by the ACA Code of Ethics as seen in code C.2.e. (ACA, 2014)

Elisa's chosen course of action can be evaluated using Sadler's tests of justice, publicity and universality. First in by pausing the session and clarifying that her role as a counselor does not include confirming or denying something that was said by one of the family members allows the Brink's and Gina to decide what they want to do with the information that has been revealed by Eric. As it would seem that the information is emotionally charged, the counselor has to remain a separate and neutral participant in the family unit. If Elisa confirms the information the parents do not retain the power of choice on whether they boys should know they are brothers and Joel and Kyle are adopted. If Elisa denies the information or acts as if she does not know, the boys do not receive justice and may lose trust in the counselor especially if the parents decide to confirm the adoption. Justice is served best by having the boys ask the Brinks and Gina and allow the parents to decide the course of action that the family wants to take at this time.

No matter what the Brinks and Gina decide to do with the question. Elisa then does a round with the family member check with the family members to see how the information is affect each of them. By checking in with each member the counselor maintains the aura of caring and safety in the group. The family then has a chance to process where they are and end the session without a significant amount of lingering tension. Elisa assigns homework to each group member asking them to describe what family means and looks like to each of them, giving them addition time to process the information whether the adoption was confirmed or denied by the parents. The homework in a sense provides a reframe for each group member to think of the others as family regardless of their titles.

Elisa's course of action is the most just for the entire family group, because any other course of action would be unjust to one or more of the family members. Doing a round, allows every one to have a voice and state how they feel about the information. Elisa maintains neutrality and works to get the family to connect around the adoption rumor instead of splitting the group. Elisa's actions do not leave questions of why she overstepped boundaries or why she in a sense abandoned one or more of the family members. Additionally she will seek out consultation from her peers to test her actions against what is reasonable in her profession. In this way Elisa's actions pass the test of publicity and do not leave lingering issues that can be questioned. The final test of universality is passed because Elisa acts in a neutral and caring manner to all of the family members. She uses the guidance of the professional ethics codes and does not cross boundaries or risk imposing her personal values on the family. Elisa is aware of this with all of her clients and would repeat the same course of action with any of them.

Step 7: Implement the course of action.

The final step in A Practitioner's Guide to Ethical Decision Making is to implement the selected course of action (Forrester-Miller & Davis, 1996). It is reasonable to expect that Elisa and her colleagues will find an acceptable and ethically sound solution to this dilemma. In taking the most appropriate steps that pass the tests of justice, publicity and universality, Elisa strengthens her ego in order to implement her course of actions confidently (Forrester-Miller & Davis, 1996). She will continue to provide support to the family throughout implementation as she upholds her ethical obligations to the counseling profession.

References

- American Counseling Association. (2014). ACA Code of Ethics. Alexandria, VA. Retrieved on 14 November, 2014 from <http://www.counseling.org/Resources/aca-code-of-ethics.pdf>.
- Beauchamp, T.L. & Childress, J.F. (2013). *Principles of biomedical ethics* (7th ed.). Oxford University Press.
- Corey, G., Corey, M.S., Corey, C., & Callahan, P. (2011). *Issues and ethics in the helping professions* (9th ed.). Stamford, CT: Brooks/Cole, Cengage Learning.
- Dasenbrook, N. & Walsh, R. (2005). Implementing Informed Consent. Retrieved from http://www.counseling.org/docs/private-practicepointers/implementing_informed_consent.pdf?sfvrsn=2.
- DOD (1999). Ethical Decision Making Plan, United States Department of Defense. Joint Ethics Regulation DoD 5500.7-R. Retrieved on 14 November, 2014 from http://www.defenselink.mil/dodgc/defense_ethics/ethics_regulation/jer1-4.doc.
- Foster, L.N. (1994). Questions for the “Problem Definition Stage” of Multiple Family Group Therapy. Retrieved on 27 November, 2014 from <http://www.multiplefamilygrouptherapy.com/Stage%20Problem%20Definition.htm>.
- Frinjs, T. & Finkenauer, C. (2009). Longitudinal associations between keeping a secret and psychosocial adjustment in adolescents. *International Journal of Behavioral Development*, 3(2), 145-154.
- Garcia, J. G., Cartwright, B., Winston, S. M., & Borzuchowska, B. (2003). A transcultural integrative model for ethical decision making in counseling. *Journal Of Counseling & Development*, 81(3), 268-277.
- Kitchener, K. S. (1984). Intuition, critical evaluation, and ethical principles: The foundation for ethical decisions in counseling psychology. *The Counseling Psychologist*, 12, 43-55.

- Knoff, H.M. (1988). Clinical Supervision, Consultation, and Counseling: A Comparative Analysis for Supervisors and Other Educational Leaders. *Journal of Curriculum and Supervision*, 3(3).
- Nash, L. (1981). "Ethics without the Sermon", *Howard Business Review* 59 Retrieved on 14 November, 2014 from <http://tcp.sagepub.com/content/12/3/43.extract>.
- Schimmel, C. & Jacobs, E. (2014). The toughest kids of groups. *Counseling Today*. Retrieved 6 December, 2014 from <http://ct.counseling.org/2014/02/the-toughest-kinds-of-groups/>.
- Swisher, L, Arslanian, L, & Davis, C. (2005) The Realm-Individual Process-Situation (RIPS) model of ethical decision-making. *HPA Resource* Vol. 5 No. 3, October 2005. Retrieved on 14 November, 2014 from http://www.apta.org/uploadedFiles/APTAorg/Practice_and_Patient_Care/Ethics/Tools/RIPS_DecisionMaking.pdf.
- Urofsky, R. I., Engels, D. W., & Engebretson, K. (2008). Kitchener's Principle Ethics: Implications for Counseling Practice and Research. *Counseling And Values*, 53(1), 67.