Article 37

The Walking Dead Model of Gatekeeping Transparency

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Abstract

This article uses American Movie Classic’s The Walking Dead metaphorically to discuss the most frequent issues dealing with problematic behaviors and gatekeeping in counselor education programs. This article proposes that there should be more transparency in the topic of gatekeeping and remediation. Additionally, information on which behaviors are seen as problematic should be shared with students in counselor education programs. This article provides examples on how The Walking Dead vignettes and story lines can be used as a teaching tool in class settings. It is suggested that engaging with students about problematic behaviors in counseling programs could lead to more willingness to preserve the ethical integrity of the profession.

Keywords: gatekeeping, remediation, counselor education, supervision, creativity

Introduction

My Love of Television

When I first heard that there would be a weekly television show based on the popular zombie comic book series called The Walking Dead, it was like a nightmarish fantasy come true. The thought of watching hordes of flesh-eating zombies week after week excited me to the point that I absolutely had to get cable. I refused to miss the premiere episode of The Walking Dead and since then, I have not missed an episode. For those not familiar with the show and my non-lethal addiction, I will provide a brief overview of both.

The Walking Dead

The Walking Dead is a television series based on the bestselling comic book series of the same name created by Robert Kirkman. The show, which appears on the
American Movie Classics (AMC) channel, tells the story of Rick Grimes, a sheriff’s deputy, who awakens from a coma and finds himself in the midst of a zombie apocalypse. He fights through hordes of zombies to find his loved ones (e.g., wife, son, etc.). Rick is reunited with his family and encounters other survivors that soon become part of his “family.” Rick continues to encounter many people over the course of the series who vary in terms of both backgrounds and morals. Both the series and the comic illustrate the hard decisions Rick has to make to ensure the survival of his group. Although their world is faced with relentless flesh-eating zombies, the biggest threat in this new world is not the dead, but the living.

**Counselor Education Experiences**

I was taking my first class in supervision while the show was near the end of its third season, and during my time in class, we discussed several issues relating to gatekeeping and civic identity, which is a personalized form of social responsibility and ethical judgment. I knew that my love of zombies would soon merge with the work I would be doing as a doctoral student, which I was fine with, as long as a zombie apocalypse did not occur while I was working on my dissertation. It was only a matter of time before I decided to use *The Walking Dead* as a metaphor in a counselor education manuscript. Gatekeeping, which is half of the subject matter that I am addressing in this manuscript, is a difficult subject to broach with both doctoral-level and master’s-level students. After all, what student would want to write, nevertheless read, about gatekeeping if they felt that they could be put behind the gates at any time? It dawned on me that fall semester that the main character (i.e., Rick) from my favorite show is a gatekeeper, literally. I also thought that if I lived in a zombie populated world, I would do whatever it took to keep the people around me safe. In fact, after deeper reflection and of course more *Walking Dead* watching, I found myself feeling the same way about counseling and my profession. This is not a great leap because if a zombie apocalypse did occur, I would still be a counselor—a zombie-killing apocalypse-surviving counselor, I should hope.

**Assumptions**

1. My first assumption is that students will be willing to learn from faculty about what problematic behaviors are.
2. My second assumption is that the show, *The Walking Dead*, provides enough case examples that can be used metaphorically for problematic behaviors.
3. My last assumption is that cinema therapy as a creative intervention will work on counseling students who see both gatekeeping and remediation as being punitive.

**Objectives**

The objectives of this article and practice are:

1. To enrich the learning experiences for students in counselor education programs;
2. To inform counselor education students about the need for gatekeeping; and
3. To get students comfortable talking about the remediation process.

**Process**

Before I use examples from *The Walking Dead*, I will first describe the live program that follows the fan favored show. It is this program that has largely influenced my vision of this article being used as a creative intervention with counseling students.

*The Talking Dead*

*The Talking Dead* is a live talk show that follows first-time aired episodes of *The Walking Dead*. *The Talking Dead* highlights zombie kills and deaths of characters, and it includes opinion polling and questions via Facebook, e-mail, and from the audience. *The Talking Dead* also gives the audience and its viewers at home a platform to engage in a deep, thorough discussion of the behaviors of the characters. The show’s host, Chris Hardwick, and its guest stars, who often include actors from the show, attempt to understand, explain, and predict the future behaviors of characters in the show by discussing and debating patterns of the characters’ current behaviors.

The steps required in this creative intervention are similar to the flow of dialog between the *The Talking Dead’s* host and its viewers. In *The Talking Dead*, behaviors are addressed with a prediction of what certain characters will do next. The steps taken in this intervention will include analyses of behavior, as well as a discussion of civic identity. The steps are provided below.

1. The first step is to take each episode and discuss the behaviors as it relates to civic identity.
2. The second step is to discuss what civic identity means to counselors and the profession.
3. Then third step is to talk about the importance of civic identity and what it means to be a gatekeeper.

**Gatekeeping in *The Walking Dead***

One of the most pivotal moments in *The Walking Dead* occurs at the beginning of the third season when Rick and his group of survivors find a prison. The prison becomes their new home, but it is also the home of a group of surviving prisoners who have survived the zombie apocalypse by remaining inside. Although the actual gate around the prison provides safety for those inside, the new threat is the group of unpredictable and unfamiliar prisoners inside the prison. These prisoners (and new survivors) present a problem for Rick because their morals and behaviors may not have been aligned with society’s moral and values before the zombie apocalypse. Rick must decide whether or not to keep the new survivors with questionable morals behind the gate with the rest of the survivors or put them outside of the gate and let them fend for themselves.

During the third and fourth seasons, Rick’s choices become more difficult. Rick not only has to keep the group of survivors together and functional, but he has to face the choices that involve letting other apocalypse survivors join their group. Throughout the show, Rick has to decide not only which of the survivors will be useful, but if the survivors can be trustworthy. Rick ultimately decides who gets accepted into the group.
and who does not. Part of Rick’s decision-making process in determining who is allowed in the group is based on personal characteristics, compliance, and observable behavior. Rick must not only look at problematic behaviors, but he has to understand and express to others why these behaviors are problematic. Rick has not only become the ultimate zombie killer in this universe, but he has proven to be the ultimate gatekeeper in this zombie-filled universe.

Rick Grimes is not the only gatekeeper in the show. Fans of the show have seen many others who gatekeep survivors of the zombie apocalypse. The other gatekeepers include the Governor/Philip Blake, the stoic and merciless leader of the town of Woodbury; Joe, the patriarchal leader of a group of marauding and hostile men; Gareth, the seemingly pleasant hipster-esque leader of the dietary challenged people of Terminus; Dawn Lerner, the leader/chief police officer with obsessive compulsive tendencies who leads her fellow officers and patients/helpers of Grady Memorial Hospital, and Deanna, the congresswoman who gatekeeps for Alexandria. All five gatekeepers provide guidelines for group entry, which include planned consequences for those who break the rules. Unsurprisingly, none of the gatekeepers provide a detailed plan of how to help their group members thrive and flourish outside of their group and community.

In the field of counselor education and supervision, several articles have been written about gatekeeping (Foster & McAdams, 2009; Glance, Fanning, Schoepke, Soto, & Williams, 2012). Many of these articles detail the process that gatekeepers use in universities to decide which students need remediation, which students should stay, and which students should not be allowed to continue. The Walking Dead television show provides many metaphorical situations that faculty face when deciding if a student needs remediation or further action if an infraction of the school policy and/or an infraction of the counseling department’s fitness to practice were to occur. Faculty members do not have to fight off hordes of flesh-eating zombies (or as the show calls them, walkers) to protect a prison, but faculty members have to decide whether or not the people that they let into the university will be a threat to the profession. Just as Rick Grimes had to decide who walks into the doors of the prison in season two, faculty members have to decide who walks into the doors of the university and the profession.

I find several choices that Rick makes parallel to what gatekeeping entails. Gatekeeping in The Walking Dead is presented as two actions; keeping zombies out and making decisions about letting certain group members stay in the group. Gatekeeping in counselor education “refers to the responsibility of all counselors, including student counselors, to intervene with professional colleagues and supervisors who engage in behaviors that could threaten the welfare of those receiving their services” (Foster & McAdams, 2009, p. 271). According to the 2014 American Counseling Association (ACA) Code of Ethics, gatekeeping is “the initial and ongoing, academic, skill, and dispositional assessment of student’s competency for professional practice, including remediation and termination as appropriate” (p. 20). In the world of The Walking Dead, group members/survivors constantly monitor each other’s behaviors, skills, and dispositions to predict whether or not a person will be a threat to the group and its survival, much like faculty members in a counseling department. Additionally, the 2014 ACA Code of Ethics works within a similar purpose, to protect the profession from individuals whose behavior may be destructive and cause harm to the integrity of the group.
Rationale

Previous Research

Students who enter Council for Accreditation of Counseling and Related Educational Programs (CACREP)-accredited counselor education programs come from different backgrounds with different expectations. However, I feel that the expectations for those students who are accepted to CACREP-accredited programs are the same. The student’s expectation is to graduate, earn the degree, and leave the program as a trained counselor. The expectations of CACREP-accredited programs are explicitly stated in standards called the 2009 CACREP Standards. Although the standards are explicitly stated, students entering CACREP-accredited programs still question (at least in my experience) how the behaviors are being assessed.

Foster and McAdams (2009) wrote that students in counselor education programs who were unfamiliar with professional performance assessment policies considered the policies punitive. Foster and McAdams found that many of the students became confused about ethical service to clients when faculty members were reluctant or did not formally address concerns about deficient professional performances of students. The authors created a framework that involved top down and bottom up communication to enhance the transparency of professional performance acceptance. The authors concluded that, “a climate of openness and transparency may be critical to students’ accurate perception of the assessment process...” (Foster & McAdams, 2009, p. 275). The authors believed that this would lead to more willingness to preserve the ethical integrity of the profession. I feel that a top down bottom up practice is the best way to address this issue.

Foster and McAdams (2009) also stated that increasing student counselors’ knowledge about gatekeeping practices alone may not be sufficient to promote their personal investment in the counseling profession. Foster and McAdams noted that Knefelkamp’s (1999) civic identity, a moral and ethical obligation, is “fostered and guided by actively guiding, challenging, and supporting learners in examining the social consequences of their decisions and actions” (p. 282). Knefelkamp (1999) also believed that effective civic identify requires good communication and the capacity to work proficiently with people. Despite the growing interest in gatekeeping in counselor education, there is little evidence to suggest that researchers are attempting to educate counseling students on problematic behavior. It would stand to reason that because students are the most impacted by it, we should make greater attempts to make the information about gatekeeping more accessible.

Therefore, the rationale and purpose of this article is to provide a creative and engaging framework for discussing gatekeeping practices with counselor education students. I propose to integrate cinema therapy techniques, which use film or media as a tool for learning, with classroom discussion. The Walking Dead, perhaps more than any other American television show in history, explores Knefelkamp’s (1999) civic identity on a regular basis. Every episode not only highlights problematic behaviors and moral decisions made by the characters in the show, but also illustrates how Rick and his fellow survivors of the zombie apocalypse encounter groups and individuals that may or may not be allowed to join their group (i.e., gatekeeping).
As the show progresses, more characters are introduced, and more groups become a part of the story line. These new groups also appear to use their own guidelines for potential group membership entry. Thus, the show depicts how gatekeeping is different for different groups of people. Additionally, characters’ behaviors are called into question, and their fitness to remain in the group is questioned continuously throughout their membership. Above all, the people that Rick encounters have to provide evidence of being able to work effectively with him. By using *The Walking Dead* to address problematic behaviors in group settings, greater learning and increased university transparency could strengthen student counselors’ motivation to learn about the profession’s practice and also give greater initiative to look at their own behaviors. Another purpose is to provide the students with literature and an entertaining and thought-provoking article that synthesizes pop culture with a serious topic in counselor education and supervision. Counseling students may read this article alone and gain a better understanding of why gatekeeping policies exist and their practical usage.

**Creative Interventions in Counselor Education**

Television is one of the many art forms that can help provide a link between theoretical concepts and real world experiences (Courtney, 2001). Television not only compresses complex stories into rich, visually intense images, much in the way that films do, but it provides the type of drama that students can become engaged in intellectually and emotionally (Courtney, 2011). Creative interventions can provide the same benefits for students as they do for counselors. There are counselors who have benefited from the use of creative approaches in areas such as family therapy (Carson, 1999) and grief and loss work (Briggs & Pehrsson, 2008). Bradley, Whiting, Hendricks, and Jones (2008) discussed how expressive techniques (e.g., cinema, art, and music) can assist counselors in the reframing of their ideas. Bradley et al. (2008) described three manuscripts that use cinema to enhance the learning experience for students learning about ethics in their profession. Each of the manuscripts used the ACA Code of Ethics to address concerns that arose in each vignette. Using the standards from CACREP to address behaviors seen in the vignettes of *The Walking Dead* could help provide useful insight, which could assist students with the learning and understanding of the principles of gatekeeping.

**Problematic Behaviors**

*The Walking Dead* episodes can be used in multiple ways. One example of how to use the episodes would be to play one episode during class and discuss the issues that arise and how they relate to gatekeeping. This is similar to what *The Talking Dead* show does. Another example of how *The Walking Dead* can be used as a creative tool is to provide the episodes as homework and have students draw parallels between what behaviors are questionable and how they can impact Rick’s group in the future. If instructors choose not to show the program in its entirety, then short clips of the episode could be chosen and the backstory could be given as a case vignette to be read. This may be more feasible since many of the characters’ actions become uncovered slowly and the impact of their actions are not revealed until much later. For the purpose of this paper, I chose four characters in situations from *The Walking Dead* to illustrate problematic behaviors and how they could be used as real life metaphors in counselor education.
Case Examples

Case Example 1: Does Carol Peletier Have Field Performance Issues and Ethical Behaviors?
Carol Peletier is a middle-aged woman who spent many years living with her abusive husband, who was killed by zombies at the campsite when it was overrun by a zombie herd. Carol has proven herself to be an asset to the group by pulling her own weight. She has decided to take it upon herself to start teaching the children in the prison how to protect themselves and how to kill zombies. Rick investigates and finds that Carol may be the person responsible for killing two fellow survivors who were stricken with a disease that could possibly infect the rest of the group. Rick must now decide whether or not she should be put out of the group or find another alternative.

Case analysis. Carol Peletier has proven herself to have basic counseling skills, or in the world of The Walking Dead, basic survival skills. What turned out to be a field performance problem initially has turned into an ethical problem. Although Carol may not have had confidence in the beginning, this is no longer the case. Rick now has a problem with Carol operating unethically, which could lead to greater problems with the group or Carol committing other unethical acts.

From a professional standpoint, Carol’s behavior could lead to expulsion from the field and from the university. How could Rick have caught this behavior earlier? Should she remain? Can she be remediated? Eventually Rick dismissed her from the prison. Counseling students may find it difficult to come up with a plan for remediation for Carol because of the severity of her action. Instructors and students can decide whether or not Carol knew what the guidelines for living at the prison were.

Another remediation issue that relates to this topic is the Ward vs. Polite (2012) case. In the case, Ward was given the option of taking a remediation program, voluntarily leaving the counselor education program, or requesting a formal hearing. What could Carol have chosen in the zombie apocalypse? What if Carol had requested a formal hearing, and what could she have pled?

Case Example 2: Does Daryl Dixon Have Intrinsic Characteristics That Could Be a Problem?
Daryl Dixon is a young man from a lower socioeconomic background. Daryl is initially tolerated by group members because he is good at killing zombies. On the outside, Daryl would appear to have some racist beliefs, which could be shared or influenced by his brother. Nevertheless, Daryl has positioned himself as a vital member of the group.

Case analysis. Daryl has shown to have great skills killing zombies, but initially Daryl had many deficits in his interpersonal skills. In the counselor education world, Daryl would have difficulties in a multicultural course addressing diversity. This The Walking Dead scenario case also allows students and instructors to discuss feelings about the screening process. In the Keeton vs. Anderson-Wiley (2011) case, a professor asked a graduate student, Keeton, a hypothetical question discussing her beliefs on LGBT clients. The faculty members decided that Keaton’s statements were a violation of multiple standards of the ACA Code of Ethics (Hutchens et al., 2013). Although Daryl was not given a hypothetical question, we can only surmise how he would have answered based
on his character in the first two seasons. Throughout the show, Daryl’s multicultural competencies have grown, as indicated by close relationships with Glenn (Asian-American male), Michonne (African-American female), and T-Dawg (African-American male).

**Case Example 3: Is Michonne Psychologically Impaired?**

Michonne is a young lawyer who lost her family during the zombie apocalypse. Michonne first appears to the group at the prison as a mysterious woman walking with a Japanese sword in one hand and a chain connected to two zombies with their arms and jaws removed on the other. Michonne appears to have developed a hardened disposition due to the changes that have occurred in her life since the zombie apocalypse.

**Case analysis.** Michonne initially appears to have personal characteristics that make her fitness to the group questionable. At times it would appear that Michonne is also suffering from PTSD (probably caused by the loss of her family). Michonne is the perfect example of the wounded healer. The wounded healer in counselor education is a counselor or healer who is impaired on an emotional level. The wounded healer may not only have difficulties with their internal emotions, but they may have difficulty expressing their emotions to others. When Michonne is first accepted into the group, she does not state much about her past or the time she spent with one of the group’s original members, Andrea. Later in the third season, Rick realizes that Michonne had not been as forthcoming as he wanted her to be, and she had not readily revealed her intention, which makes Rick question her integrity. In the literature on gatekeeping and remediation, one of the “core competencies of professionalism” is characterized by the element of integrity/honesty (Bodner, 2012, p. 61). Michonne’s intentions are not clear and could easily be scrutinized by others in the group because she cannot be judged easily. Foster and McAdams (2012) noted that “student’s perceptions of their peers might be overly judgmental because of poor understanding of the professional performance standards” (p. 274). Rick may not have provided standards of honesty for the group, but after this particular event, students can be able to see why honesty is a major consideration in one’s fitness and why it would also be important for Rick in his future encounters. If the prison had a better criteria and better guidelines, the situation would have been handled more properly. The consensus in the mental health field is that counselors and wounded healers can transcend their tragic and painful experiences (Miller, Wagner, Britton, & Gridley, 1998).

**Case Example 4: Were Shane Walsh’s Behaviors Ignored Too Long?**

Shane Walsh is the best friend to Rick and for a time was the sole leader of the group before the arrival of Rick. After the return of Rick, Shane commits questionable acts that the audience could see as being in a ‘gray area’ between what is right and wrong. What makes Shane’s behaviors a problem is that they persist for a very long time throughout the show.

**Case analysis.** In recent years, there has been debate regarding the role of gatekeeping and how to define impairment. In the case of Shane, there is a great deal of impairment and a great many behaviors that were being ignored. Glance et al. (2012) found that approximately 5% of students may be problematic yet receive no remediation. Researchers call this phenomenon “gateslipping.” Shane Walsh commits or attempts to
commit many questionable deeds. His behavior is a problem for everyone around him, even though he is an asset to the group. Students watching and discussing this type of behavior may discuss many implications of gateslipping. One question that may be discussed is, “When and where should a line be drawn in regards to problematic behaviors?” A second question that could be asked is, “Was a remediation viable for Shane Walsh?” The discussion about when to address these issues (e.g., earlier in the program or later) could and should be discussed with students.

We Are All Infected

The goal for using The Walking Dead for case studies and case examples is that it helps the student put theory into practice, and it can help deepen the understanding of problematic behaviors that lead to remediation. Many millennials, people born between the 1980s and the early 2000s, are fans of The Walking Dead. Additionally, many millennials are currently in college, potentially studying counseling. Research has shown that millennial students display a great interest in the use of technology and active learning (Wilson, 2004). Research also encourages contact between students and faculty (Wilson, 2004). The contact between students and faculty is important if a top down and bottom up discourse, as suggested by Foster and McAdams (2009), were to happen. Faculty members may encourage counseling students to read this article in hopes that their students will gain an understanding that all groups invest in gatekeeping for the survival of their group. Faculty members and students who are fans of the show may also find it interesting that gatekeeping occurs every season when new survivors are introduced.

When Rick Grimes informs the group (and the audience) that we are all infected, this could be used metaphorically to describe that all people are infected (but not with a zombie plague). We are all human beings and we are all capable of making mistakes and having moments where we do not reflect on our actions carefully, and therefore we do not realize the impact that we have on other people.

As viewers of the hit show have seen, many of the characters commit behaviors that are dubious and/or questionable and, above all, problematic. Once again, the list of case studies I provided is not exhaustive. The behaviors that the characters in the show exhibit are similar to behaviors of students in counselor education programs, with the exception of the zombie killing. The Walking Dead show provides great metaphors that can be used to address the themes in current gatekeeping literature. The prison that was home to the characters in seasons 3 and 4 could be used as the university and the survivors inside (e.g., Rick Grimes, Lori Grimes, Glenn Rhee, Carl Grimes, Darryl Dixon, Maggie Greene, and Hershel Green) as faculty members who have to decide among themselves who comes into the prison and who should be outside of the gate. The “herd,” which in the show is used to describe the hordes of the walking dead that circle the prison, could be used to describe the applicants who seek entry every year into counselor education programs. Although the term “herd” could be seen as derogatory, it may reflect how universities feel about the copious amounts of applications they receive every semester. The “infection” that the living all have in the show can be used to describe the ability to act out in harmful ways.
Strengthening the Idea of Remediation

The notions of remediation permeate throughout the show. No one in the show is completely innocent, and everyone has done something regrettable in order to survive in this bleak and horrid world. The same can be said about a person and their life experiences, except that our world may not be as horrific. But as the show suggests many times, what you did in the past is not as important as what you have done since the zombie apocalypse. However, in the real world, the behaviors you commit as a counselor are of real concern for faculty and clients. Remediation occurs throughout the show because the characters in the show who act as gatekeepers realize that no one is truly bad. The same can be said about the master’s-level students who enter the profession. Someone who is new to the field of counseling may have problems acclimating to a professional world. Additionally, the role of counselor is new to the student. Students in counselor education programs need to view the remediation process as something that could help them grown not only as a professional, but as a person.

Multicultural Implications

Fans of *The Walking Dead* will note that there is a great amount of racial, ethnic, and socioeconomic diversity in the show. The multicultural cast is one of the reasons why the show is so successful and why it has so many fans. Two characters on the show that appear to be most likely to resist a multicultural view of the world before the zombie apocalypse are brothers Merle and Daryl Dixon. The two brothers have taken two entirely different paths in regards to the relationship with others in the show. The paths taken can be used by instructors to discuss choices that we make that could strengthen or weaken the relationships we have with people that are diverse from ourselves.

Not every person is a fan of popular culture, and *The Walking Dead* has become a huge part of popular culture (e.g., toys, video games, lunch boxes, etc.). Some students may react negatively to the comparison between counselor education and zombies. Not all millennials, nevertheless counseling students, are fans of popular culture. Some students may even be offended by the notion that they are “infected” by problematic behavior and biases. Students should keep in mind that this creative intervention focuses only on the actions of the characters and not the zombies. Additionally, this creative intervention should be presented as an option for the class.

Requirements and Limitations

Faculty members may ask many questions upon meeting potential students in their counselor education programs. But questions such as, “How many walkers have you killed?” and “How many people have you killed?” will probably not be asked by faculty members during the interview or orientation process. One limitation is that this manuscript, or the show for that matter, may not be of interest to anyone who is not interested in *The Walking Dead* or at least interested in gatekeeping literature. The suggestions that I provide in this paper as a whole may be well received by a very small number of people who are fans of the show and are interested in gatekeeping in counseling literature.

Another limitation of this article is that the metaphors have not been used in a classroom setting thus far. This paper is merely a creative suggestion of how a popular
show such as AMC’s *The Walking Dead* can be used in counselor education to facilitate the learning of both gatekeeping practices and the remediation process. There is no way to prove the effectiveness of this article without using this article in an actual study. Hence, a case study would be the next step into using *The Walking Dead* as a useful metaphor in counseling education.

Finally, students may not be willing to watch the show or clips of the episodes. This is not surprising given the very nature of the show. Not everyone wants to spend an hour watching zombies (although they may feel like a zombie dealing with graduate school stress). However, due to the popularity of the show, many may read it out of morbid curiosity. Also, because this is a theoretical article and there is no pilot study for this intervention, the premise may be suspect.

Counseling students who are fans of the show may read the article simply because it uses *The Walking Dead* as a metaphor and may realize from the article that the decisions made in regards to gatekeeping and remediation are tough, but not meant to be punitive. This will only happen assuming the counseling student decides to type in “*The Walking Dead*” while searching for an academic article. The mostly likely scenario would be that this article is shared by faculty members with their students to get them comfortable with the presented topics. Both the process of monitoring unethical behaviors and remediating problematic behaviors are meant to protect not only the counseling profession but the clients we serve. In other words, having to go through remediation or having to be conscious of gatekeeping can “bite,” but it will not kill you.

References


*Keeton v. Anderson-Wiley,* 664 F.3d 865 (11th Cir. 2011).


Note: This paper is part of the annual VISTAS project sponsored by the American Counseling Association. Find more information on the project at: http://www.counseling.org/knowledge-center/vistas