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Issues and Insights

A Dilemma Within Doctoral Supervision: Applying an Ethical Decision-Making Model

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This article is based on the second place–winning submission to the 2019 American Counseling Association Graduate Student Ethics Competition for Doctoral Degree Students. The fictional ethical dilemma presents three perspectives within doctoral supervision (i.e., a doctoral supervisor, supervisees, and faculty supervisor) related to grappling with master's-level school counseling supervisees. A selected ethical decision-making model is used to delineate the problems and dimensions of the dilemma and offer courses of action in response to the ethical dilemma. Implications for counselors, supervisors, and counselor educators are discussed.

Keywords: ethical issues, ethical decision-making model, clinical supervision, dual relationships, doctoral level

Counseling professionals routinely evaluate the most ethical course of action in a given situation. Because counselors are positioned as advocates who support clients with diverse experiences and engage in decision-making in the best interest of clients' well-being and safety, ethical decision-making processes are rooted in the everyday practice of counseling professionals. Researchers have found inconsistencies in ethical training and have called for ethical decision-making models to be used in training and practice (Burkholder et al., 2020; Cottone & Claus, 2000; Levitt et al., 2015). The implementation of such models is an important ongoing practice to support practitioners, supervisors, and counselor educators who face and respond to various ethical dilemmas.

This article addresses ethical issues and practices through a fictional scenario offered by the 2019 American Counseling Association's (ACA) Ethics Competition in which our entry earned second place. This article considers multiple

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facets of an ethical dilemma faced by a doctoral supervisor, master's-level students, and faculty supervisor, who are operating in today's complex sociopolitical environment. We used a selected ethical decision-making model (Forester-Miller & Davis, 2016) to identify and evaluate the ethical dilemmas according to the *ACA Code of Ethics* (American Counseling Association [ACA], 2014) and illuminate the procedural steps and application of the ethical decision-making model. We briefly describe the ethical dilemma and the selected ethical decision-making model (Forester-Miller & Davis, 2016), followed by a review of the steps in response to the scenario. We conclude by offering potential courses of action and consequences, along with recommendations for the best possible outcome. At present, there is limited research about ethical examples at the doctoral supervision level (Grunhaus et al., 2018), although doctoral supervisors may experience a myriad of ethical dilemmas, including (but not limited to) gatekeeping, management of the supervisory alliance and boundaries, dual and multiple relationships, and multicultural issues (Ancis & Ladany, 2010; Dickens et al., 2016; Minor et al., 2013; Pakdaman et al., 2015; Rapp et al., 2018; Scarborough et al., 2006). This article addresses this gap in the literature by exploring a dilemma that includes common ethical issues faced within the context of doctoral supervision.

Description of the Ethical Dilemma

What follows is a brief summary of the fictional ethical dilemma presented by ACA for the 2019 Ethics Competition. Enrique is a third-year doctoral student supervising two school counseling students completing their practicum at a local high school. He developed a romantic interest in one of these supervisees (Madeline) but has not acted on that interest to date. Both supervisees have strong ties to immigrant communities in that one (Farah) is an international student from Turkey and the other (Madeline) is an undocumented student and Deferred Action for Childhood Arrivals recipient whose immigrant parents are at risk of being deported. Dr. Smith, the faculty supervisor for Enrique, noticed the growing relationship between his supervisee, Enrique, and Madeline and offered to take over primary supervision of her clinical work. After consultation and reassurance by Enrique, this did not take place and Enrique continued to supervise Madeline.

At their practicum site, the two students participated in a rally related to U.S. immigration policy, and Enrique received a Facebook invitation to the rally because he was Facebook friends with his supervisees. Enrique viewed Madeline's post of a preliminary diagnosis of the current U.S. president on the Facebook page connected to the rally. Enrique attended the rally and observed Farah instructing the gathering on how to write to their representatives at the state and federal levels and passively resist deportation. Madeline also delivered a speech on the evils of the current administration and labeled many political leaders' behaviors in specific diagnostic terms.

She stated this with great confidence and spoke of her counseling training at "State University." Enrique decided to address his concerns with the supervisees during their individual supervision sessions and did not mention these issues to his faculty supervisor, Dr. Smith.

Framework for Ethical Decision-Making

We determined avenues to address the highlighted dilemma through the use of an ethical decision-making model. Cottone and Claus (2000) found that more than 30 ethical decision-making models have been introduced in the literature. In the 2 decades since Cottone and Claus's review of the literature, there have undoubtedly been additional models introduced in the field (e.g., Cottone, 2001; Garcia et al., 2003; Kocet & Herlihy, 2014; Luke et al., 2013). Thus, it is important that the selected ethical decision-making model to address the presented ethical dilemma be well-defined, practically applied, and widely accepted.

We chose the ethical decision-making model outlined by Forester-Miller and Davis (2016), which offers a robust, stepwise approach. The foundation of this model consists of five moral principles (e.g., autonomy, justice, beneficence, nonmaleficence, and fidelity), which are seen as the groundwork and are central to approaching ethical dilemmas and making ethical decisions in the counseling profession (Forester-Miller & Davis, 2016). In the first step of this model, it is important to gather as much information possible on the identified issue. Because of the complexities of ethical dilemmas, seeking consultation from others encourages a rigorous consideration of all facets of the issue to separate bias or suspicions from facts (Forester-Miller & Davis, 2016). Second, relevant professional ethical code(s) are applied, including multicultural considerations. Third, it is important to determine the various dimensions of the dilemma. For example, professional counselors must consider the relevance of the foundational principles, review literature to understand the dilemma, and consult with faculty or colleagues, appropriate institutional officers, and institutional policy. Fourth, brainstorm potential courses of action with colleagues or key stakeholders (Forester-Miller & Davis, 2016). Fifth, one should take care to consider the potential consequences of all options. Options that cause additional problems or do not produce desirable results should be eliminated (Forester-Miller & Davis, 2016). When an ethical dilemma occurs within a counseling department, faculty should jointly consider available options and most appropriate course of action (Letourneau, 2016). Sixth, when a course of action has been chosen, it should also be evaluated to consider any new ethical considerations. Forester-Miller and Davis suggested three ways to test the course of action: (a) Is the choice fair and just? (b) If the solution were to be reported in the press, would it be generally appropriate behavior? and (c) Would the same course of action be recommended for others to use? Last, should the course of action pass the ethical rigor in prior steps, the resolution should then be

enacted and then assessed again to determine the desired effect (Forester-Miller & Davis, 2016).

An Ethical Decision-Making Model in Action

The application of Forester-Miller and Davis's (2016) ethical decision-making model has been applied to the presented ethical dilemma and will be reviewed at three levels: the doctoral supervisor, supervisees, and faculty supervisor. We concluded that the primary responsibility was with the doctoral and faculty supervisors who oversaw Farah and Madeline's conduct as practicum students. In response to his supervisees' behaviors, Enrique can begin the chain of action to prompt Dr. Smith and other faculty to enact a course of action that will create meaningful learning experiences for Enrique as well as Farah and Madeline.

Step 1: Identify the Problem

First, making diagnoses is outside of the scope of Farah and Madeline's competency as school counseling trainees. Hence, Madeline's decision to publicly label and diagnose the behaviors of political leaders, including the sitting U.S. president, was inappropriate and unethical because the U.S. president is not her client. Lieberman (2018) suggested that the allied fields of mental health are "vulnerable to being exploited for partisan political purposes" (p. 1) and, ethically, practitioners should not engage in diagnosing elected officials. Because they are unlicensed, Farah and Madeline would require supervision regarding clinical assessments and diagnosis as well as consent from clients. Moreover, diagnosis without sufficient supporting information runs the risk of misdiagnosis, which can lead to claims of malpractice (Kirk & Kutchins, 1988). Additionally, because of its inflammatory nature, Madeline's speech may affect the safety of members of the community, and the students' outspoken perspectives could also jeopardize the professional relationship between the high school and State University.

Enrique, even after recognizing his own feelings toward Madeline, continued to supervise her without intervention from Dr. Smith. Enrique may be obscuring clear boundaries and potentially creating a dual relationship (Kagle & Giebelhausen, 1994), and his feelings may have an impact on his judgment regarding her counseling competency. Kagle and Giebelhausen (1994) posited that nonsexual and sexual dual relationships have the potential to be exploitative and may inevitably and unknowingly create harm for both parties. Enrique is also connected to his supervisees via social media, which is continued evidence of boundary crossing and not recommended (Yonan et al., 2011). Researchers, however, have offered a contrary yet positive perspective on boundary crossings. Supervisors with rigid boundaries with supervisees may hinder the development of deeper and more authentic mentoring relationships (Kozlowski et al., 2013). Enrique also purposefully did not report the incidents from the rally, and instead, he attempted to

handle them independently and without guidance. Enrique's obligations as a supervisor were to focus on the performance of his supervisees and ensure the welfare of their clients. Because Enrique did not report the incidents, Dr. Smith and the site supervisor lost the opportunity to appropriately address the students' conduct and offer appropriate remediation.

Finally, Dr. Smith, as Enrique's faculty supervisor and cosupervisor for the master's students, noticed the growing closeness between Enrique and Madeline, which signaled Dr. Smith's awareness of its inappropriateness regarding the possible crossing of professional boundaries and ethical violations within the supervisory relationship (Kagle & Giebelhausen, 1994). Despite offering recourse by taking over primary supervision of Madeline, Dr. Smith still entrusted Enrique with the continued responsibility of supervision. Dr. Smith's inaction was problematic because it was the faculty supervisor's obligation to serve as a gatekeeper and supervisor of the doctoral supervisor (Glance et al., 2012; Hutchens et al., 2013). Dr. Smith's commitment was also to the well-being and safety of the master's students, and the decision to avoid further action was a failed opportunity for remediation (Henderson & Dufrene, 2011; Hutchens et al., 2013).

Steps 2 and 3: Apply Ethical Codes and Determine the Dimensions of the Dilemma

Autonomy. Autonomy is the principle of allowing individuals to make choices and act independently (Forester-Miller & Davis, 2016). Enrique may have modeled autonomy by respecting Madeline and Farah's decision to speak at the rally, yet he failed to help his supervisees understand how their decisions could be received by others (*ACA Code of Ethics*; ACA, 2014, Standard E.1.b.). Although they may have the capacity to make sound and rational decisions, autonomy does not translate into a carte blanche for Farah and Madeline to say whatever they want without being held to a professional code of ethical conduct (*ACA Code of Ethics*; ACA, 2014, Standard C.2.a.). Dr. Smith also neglected helping clients (or supervisees) to understand how their decisions may be received by and affect others. Rather than taking over as primary supervisor for Madeline, Dr. Smith ultimately permitted Enrique to continue in his supervision role, an inadequate response to the dilemma (*ACA Code of Ethics*; ACA, 2014, Standards F.7.a. and F.7.e.).

Beneficence. Beneficence is the principle of doing good and preventing harm to ensure the welfare of clients (Forester-Miller & Davis, 2016). Farah and Madeline may have been well-intentioned in participating in the rally, but this participation extends beyond conventional counseling parameters (*ACA Code of Ethics*; ACA, 2014, Standard A.6.b.). In addition, Madeline fails to consider the ramifications of her remarks (*ACA Code of Ethics*; ACA, 2014, Standard C.2.a.), and her efforts to diagnose the behaviors of public officials are beyond the scope of her professional boundaries as a practicum trainee (*ACA Code of Ethics*; ACA, 2014, Standards E.5.a. and E.5.d.). Madeline also

explicitly expounds on her training at State University and speaks publicly. However, she does not have permission to act as a public representative of the university, nor is she qualified to do so (*ACA Code of Ethics*; ACA, 2014, Standards C.2.a. and C.4.a.).

Enrique's decision to continue supervising Farah and Madeline may be his attempt to do good and take responsibility for his supervisees' welfare, yet it compromises the welfare of the rally attendees (*ACA Code of Ethics*; ACA, 2014, Standard E.1.b.). However, Enrique's feelings toward Madeline may continue to affect his judgment as a supervisor, and he needs to proactively consider conflicts of interest that may potentially harm the supervision relationship and training experience for the supervisee (*ACA Code of Ethics*; ACA, 2014, Standard F.3.a.). Enrique's verbal commitment to not act on his feelings toward Madeline and maintain professional boundaries is insufficient. Enrique's commitment to the training experiences of both students was compromised when he failed to disclose information to Dr. Smith (*ACA Code of Ethics*; ACA, 2014, Standard F.5.b.). By addressing these issues in individual supervision with the trainees rather than consulting with Dr. Smith, he uncomfortably positions himself to balance the difficult discussion of Madeline and Farah's inappropriate behaviors at the rally while also making them complicit in his decision to hide the concerns from the rally from Dr. Smith (*ACA Code of Ethics*; ACA, 2014, Standards F.4.c. and I.2.c.). Furthermore, Dr. Smith's short-lived attempt at beneficence could have been an early intervention to protect the supervision relationship as well as an opportunity for Dr. Smith to model appropriate ethical conduct in supervising master's students (*ACA Code of Ethics*; ACA, 2014, Standards F.4.c. and F.6.b.).

Nonmaleficence. Nonmaleficence is another foundational principle, which includes doing and risking no harm to others (Forester-Miller & Davis, 2016). Although Farah's speech on social justice may be made with good intentions, she fails to consider the safety of the students and families who are undocumented; by following her recommendations, these families could be mired in legal difficulties or be deported themselves (*ACA Code of Ethics*; ACA, 2014, Standard C.2.a.). For Enrique, his ethical obligation is to inform Dr. Smith about any concerning behaviors that affect supervisees' ability to effectively serve in their practicum site (*ACA Code of Ethics*; ACA, 2014, Standard F.7.g.). His decision not to inform Dr. Smith calls into question whether he would do the same for supervisees other than Farah and Madeline, and it is important to determine whether Enrique's decision to avoid conflict is in their best interest (*ACA Code of Ethics*; ACA, 2014, Standard F.3.a.). By not informing Dr. Smith, Enrique potentially harms students and families as well as the university's partnership with the high school (*ACA Code of Ethics*; ACA, 2014, Standard F.4.c.). As for Dr. Smith, he decides to do nothing more after expressing trust in Enrique, despite the initial concern about boundaries (*ACA Code of Ethics*; ACA, 2014, Standards F.4.c., F.4.d., and F.6.b.). By avoiding action, the supervision experience is compromised, thus harming the supervision relationship and experience (*ACA Code of Ethics*; ACA, 2014, Standards F.5.a., F.8.d., and F.9.a.).

Fidelity. Fidelity is the principle of honoring commitments in order for growth to occur in the supervisory relationship (Forester-Miller & Davis, 2016). Farah and Madeline have a commitment to counseling relationships with students, families, and staff and should have considered the ethical issues related to their involvement (*ACA Code of Ethics*; ACA, 2014, Standards E.1.b. and I.1.b.). It is important to question whether they are acting within professional boundaries and their level of competency (*ACA Code of Ethics*; ACA, 2014, Standard C.2.a.). Madeline's use of inflammatory language and Farah's recommendations for passive resistance may affect not only their efficacy as counselors but also the safety of the community, which then affects their ethical commitment to the welfare of the students and families served at the practicum site (*ACA Code of Ethics*; ACA, 2014, Standard E.1.b.).

Enrique's commitment is to honor the supervisory relationship with Madeline and Farah. By withholding concerns about the supervisees from Dr. Smith, Enrique jeopardizes his capacity to serve as a supervisor (*ACA Code of Ethics*; ACA, 2014, Standard F.3.a.), because it is his ethical obligation to report concerns about supervisees (*ACA Code of Ethics*; ACA, 2014, Standard F.7.g.). In addition, the dual relationships with Farah and Madeline via social media represent a crossing of boundaries, and his closeness with Madeline calls into question Enrique's ability to maintain appropriate, professional boundaries as a supervisor (*ACA Code of Ethics*; ACA, 2014, Standards F.3.a. and F.3.b.). Dr. Smith has an ethical commitment to honor the supervisory relationship with Enrique (*ACA Code of Ethics*; ACA, 2014, Standard F.5.a.), yet his inaction models inappropriate behavior as supervising faculty for Enrique and other doctoral students in the program (*ACA Code of Ethics*; ACA, 2014, Standard F.7.b.). More important, Dr. Smith's commitment is to the welfare of Farah and Madeline, as supervisees, as well as the students and families served at their practicum site (*ACA Code of Ethics*; ACA, 2014, Standard F.1.a.). Dr. Smith's inaction and lack of knowledge about Farah and Madeline's behaviors jeopardize the competency of the master's students and doctoral student as well as the students and families (*ACA Code of Ethics*; ACA, 2014, Standard F.1.a. and F.6.b.).

Steps 4 and 5: Consider Potential Courses of Action and Possible Consequences

Farah, Madeline, Enrique, and Dr. Smith all could have taken various courses of action. Farah and Madeline may or may not have been aware of the ethical dimensions of their behaviors, but they made decisions to engage in the rally without consulting their doctoral or faculty supervisor. Likewise, Enrique had opportunities to seek support regarding the potential dual relationship with Madeline but did not follow through. Dr. Smith's inaction constituted a missed opportunity to support Enrique and meaningfully intervene. It is also worthwhile to explore how the counseling program at State University might address ethical conduct with its students at a systemic level.

Potential courses of action and consequences for Farah and Madeline. Since participating in the rally, Farah and Madeline can seek guidance from their supervisors to evaluate their involvement as practicum students in the school rally. They can engage in guided reflection about understanding the process of ethical decision-making as well as consult with their supervisor to brainstorm possible courses of action to minimize the potential negative consequences experienced by the students and families. If Farah and Madeline's involvement in the rally precipitated any harm to the students and families involved in the rally, they may lose their practicum placement, affecting their academic trajectories in their program, and require remediation, as a measure of gatekeeping (Foster & McAdams, 2009; Glance et al., 2012; Henderson & Dufrene, 2011). Tsoi (2018) presented an alternative perspective that citizens have a moral duty to engage politically because politics affect the personal lives and values of individuals.

Potential courses of action and consequences for Enrique. Enrique can first inform and seek supervision from Dr. Smith or other faculty about the students' conduct at the rally and the potential dual relationship with Madeline (Kagle & Giebelhausen, 1994). Enrique can also seek remedial training and consultation on how to appropriately conduct conversations with Farah and Madeline in individual supervision about the concerns over their involvement in the rally. Furthermore, Enrique should consider the appropriateness and consequences of being Facebook friends with master's students during the supervision experience and seek guidance from a faculty member to weigh the benefits and risks (Yonan et al., 2011). Enrique may require remediation. Engaging in remediation may affect his trajectory in his doctoral program, but it is also a supportive learning experience. Enrique may also need to unfriend Madeline and Farah from Facebook until they have completed their programs, and provide a rationale for doing so (Yonan et al., 2011).

Potential courses of action and consequences for Dr. Smith. Dr. Smith can remove Enrique as the cosupervisor for Madeline and take over primary supervision of Madeline. He can have a discussion with Enrique about approaching the ethical dilemmas of dual relationships and his general ethical conduct as a supervisor, as well as consult with other faculty members to develop a formal plan of remediation for Enrique, Farah, and Madeline (Cobia & Boes, 2000; Glance et al., 2012; Henderson & Dufrene, 2011). Dr. Smith could have also proposed an alternative action in which he more vigilantly checked in with Enrique regarding his interactions with his supervisees to ensure that Enrique was committing to his word. It would also be important for Dr. Smith and other faculty to follow up with Farah and Madeline regarding conduct as practicum students representing State University.

Potential courses of action and consequences for the counseling program. As reactive and proactive measures, the faculty can explicitly teach appropriate professional boundaries between doctoral and master's students. This practice can be communicated proactively, consistently, and clearly at the new student orientation, field experience orientations, supervision course

and training experiences, and remedial opportunities (McAdams & Foster, 2007). For example, the Council for Accreditation of Counseling and Related Education Program (CACREP) requires counseling programs to have orientations for incoming students to explain and teach the importance of ethical practice as developing counselors (CACREP, 2016). State University's counseling program can address the expectations and behaviors of students in their field experiences (McAdams et al., 2007), including the benefits and risks of public engagement in a rally. The faculty can also discuss whether to offer remediation for Farah and Madeline regarding their public engagement at the rally while reiterating their roles as practicum students, as well as discuss a remediation plan for Enrique regarding his role as a doctoral supervisor (Henderson & Dufrene, 2011).

The counseling program can designate another faculty member to investigate the concerns regarding the dual relationship between Enrique and Madeline, because Dr. Smith's judgment of the closeness between Enrique and Madeline may be clouded because of his previous inaction. The counseling program can also designate either Dr. Smith or another faculty member to speak with Farah and Madeline and contact the site supervisor about the nature and impacts of their participation. Another possible course of action is for the program to do nothing or allow for the questionable unethical behaviors to continue. Such inaction would, however, result in missed opportunities for the program to model corrective action and appropriate ethical behaviors as well as promote a culture of unresponsiveness to ethical concerns, which directly contradicts the code of ethical practice in the counseling profession. When a program does not take proactive measures to clearly articulate the importance of the professional counselor identity and ethical mandates, students lack competency in ethical practices. In turn, this affects their ability to reflect on their practice, effectively develop their clinical skills, and create appropriate boundaries within each counseling relationship (McAdams & Foster, 2007). Such preventative measures may reduce the needs for consequences and remediation for students, which takes significant time and energy for students and faculty alike.

Steps 6 and 7: Evaluate and Implement the Course of Action

On the basis of a rigorous review of the prior five steps of the ethical decision-making model (Forester-Miller & Davis, 2016), we recommended five steps in evaluating and implementing a course of action to address the ethical dilemma with Enrique, Farah, Madeline, and Dr. Smith as well as the counseling program at State University. The recommended actions effectively and comprehensively respond to the ethical dilemma, adhere to the *ACA Code of Ethics* (ACA, 2014), and do not create new ethical considerations. Each course of action passes the tests of justice, publicity, and universality.

First, Enrique should initiate the discussion with Dr. Smith about Farah and Madeline's participation in the rally. Because Dr. Smith is Enrique's

faculty supervisor, Enrique should report any pressing concerns about his supervisees to Dr. Smith, including Farah and Madeline's involvement in the rally, use of inflammatory language, and speculated diagnoses and labels about the current president and political leaders. In addition, the dual relationship issue should be discussed with Dr. Smith, and then Dr. Smith, as the faculty supervisor, can take appropriate next steps to address the issue.

Second, Dr. Smith can submit a report to the counseling department of State University. He can address his initial suspicions about the potential dual relationship between Enrique and Madeline, his own failure to intervene and support both students, and the nature of Farah and Madeline's participation in the rally. As Enrique's supervisor, he can also report an assessment of Enrique's competence and actions, or lack thereof, as a doctoral supervisor, which will allow the counseling department to collectively decide on next steps for Enrique, Farah, Madeline, and Dr. Smith.

Third, we recommended that the faculty investigate the reported ethical conflicts and violations. Faculty can consult with Dr. Smith about his decision to have Enrique continue as the doctoral supervisor for Madeline, despite recognizing their growing closeness. Faculty can also assess Dr. Smith's violations of ethical conduct and offer guidance for his future supervisory interactions with Enrique and other supervisees.

Fourth, we recommended that the faculty discuss, develop, and agree upon an appropriate remediation plan for Enrique, Farah, and Madeline. For Enrique, the faculty can provide the opportunity for him to reflect on the ethical conflicts in his role as a doctoral supervisor and ways in which he could have corrected his decisions to move forward productively and meaningfully, considering his future as an aspiring counselor educator and faculty member. The faculty can also offer Enrique an opportunity to share his input about a remediation plan and process that would be most helpful for his development—a level of adequate support and challenge for Enrique as a developing counselor educator (Foster & McAdams, 2009). Moreover, we recommended that Dr. Smith and the faculty meet with Farah and Madeline to guide them in reflection about balancing their personal and professional interests along with their roles as practicum students and in their future internship sites.

Fifth, in reaction to the investigations, conversations, and remediations for those involved, we recommended that the counseling department develop a systems-level action plan for the counseling program. One aspect of the action plan can include ongoing professional development training for master's and doctoral students about appropriate ethical practices at their field sites. Faculty can also lead discussions with and assign relevant readings in courses for students to not only identify ethical issues but also actively use ethical decision-making models (Burkholder et al., 2020). This may provide an opportunity for faculty to model for doctoral students how to effectively facilitate such discussions and resolve ethical issues. For the future, faculty members can include content during orientations that

specifically addresses appropriate conduct and ethical practice for future practicum students.

Implications

The proposed ethical decision-making model has implications for counselor supervision, education, and future research.

Supervision

This case study reminds supervisors of the importance of avoiding dual relationships with supervisees. The *ACA Code of Ethics* (ACA, 2014) strictly prohibits clinical supervisors from having sexual or romantic relationships, which present boundary violations. Such feelings may lead to exploiting supervisees, losing objectivity, disrupting the supervisory relationship, and possibly doing harm (Gottlieb et al., 2007). The *ACA Code of Ethics* (ACA, 2014) requires supervisors to weigh the benefits and risks of extending beyond the current supervisory relationship, and supervisors are recommended to seek supervision and apply sexual feelings management models to determine the next step (Koenig & Spano, 2004).

Supervisors can also promote the social justice skills of supervisees. It is important for supervisors to start conversations regarding diversity, power, and privilege in supervision to raise this awareness among their supervisees (Hays & Chang, 2003), especially considering the diverse and intersecting identities and experiences of counseling trainees and the clients and students served. Glosoff and Durham (2010) recommended that supervisors develop social justice awareness with their supervisees by (a) assessing supervisee cognitive complexity; (b) initiating focused discussion; (c) using reflective interventions, such as reflective questioning, genograms, mapping world-view and social capital, and examining intake and treatment procedures and interventions; and (d) using structured instruments. For example, with respect to the presented ethical dilemma in this article, Dr. Smith could use formal and informal measures to assess Enrique's developmental level and guide Enrique to critically reflect about and discuss the relevance of power and privilege within Enrique's supervision dynamics with his supervisees.

Counselor Education

Counselor education programs prepare doctoral students to work effectively as counselor educators, supervisors, researchers, and practitioners with supervision as a core area of competence according to CACREP (2016). Because doctoral students may serve as supervisors for master's students, counselor educators can help students address potential boundary issues proactively. Counselor educators can address and offer students practice exercises in handling potential legal and ethical issues and responsibilities in clinical supervision in the academic and training curriculum (CACREP, 2016). For example, counselor educators can use the present vignette and other dilemmas

to increase students' awareness regarding ethical issues. Counselor educators can also introduce this ethical decision-making model (Forester-Miller & Davis, 2016), along with other published models, as tools to address and process ethical issues to be encountered. Additionally, it is an ethical imperative that counselors intervene with colleagues and supervisors who risk the welfare of those receiving their services, whether clients or supervisees.

Future Research

Although this model addresses all the components of ethical dilemma decision-making, it is still a theoretical model and lacks empirical validation, like the numerous other ethical decision-making models proposed by researchers in the counseling field. Further research could explore and compare the processes and outcomes of using the model by Forester-Miller and Davis (2016) with those of using other ethical decision-making models by analyzing the dilemma presented in this article with other models. Researchers could explore the experience of supervisors using this model or training outcomes of integrating this model into curricula. Researchers can consider quantitative methods, such as randomized controlled trial interventions and survey research, to measure differences in comprehension and implementation of ethical decision-making models as well as qualitative methods to understand the experiences of counseling students and practitioners' use of ethical decision-making models in practical scenarios.

Conclusion

This article presented an application of Forester-Miller and Davis's (2016) ethical decision-making model and delineated the various dimensions, complexities, and consequences in the fictional ethical dilemma. The welfare of those receiving services is of utmost consideration when one is considering the dimensions of the dilemma, potentially affecting the outcomes of the students and families. Furthermore, the *ACA Code of Ethics* (ACA, 2014) guides and justifies the understanding of and responses to the presented ethical dilemma. This comprehensive and systematic use of this ethical decision-making model demonstrates its practicality and cohesiveness so that supervisees, supervisors, counselor educators, and practitioners can use the model to understand, evaluate, and draw conclusions about future complex ethical dilemmas.

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