



STATE OF ARIZONA
BOARD OF BEHAVIORAL HEALTH EXAMINERS
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DOUGLAS A. DUCEY
Governor

TOBI ZAVALA
Executive Director

October 22, 2018

Karen Williams
[REDACTED]

Dear Ms. Williams:

On August 3, 2018, the Arizona Board of Behavioral Health Examiners ("Board") reviewed your application for licensure as a licensed professional counselor and determined that you are not eligible for licensure pursuant to A.R.S. § 32-3275(6). Specifically, the Board found that you engaged in conduct that had you been licensed would have constituted grounds for disciplinary action. The Board determined that the disciplinary action invoked the following violations that were based upon the conduct referenced thereafter:

1. A.R.S § 32-3251(16)(l), engaging in any conduct, practice or condition that impairs the ability of the licensee to safely and competently practice the licensee's profession.
2. A.R.S § 32-3251(16)(c)(i), making any oral or written misrepresentation of a fact to secure or attempt to secure the issuance or renewal of a license.

These violations were based on the following findings:

1. In 09/17, Karen Williams ("Applicant") submitted her LPC application to the Board.
2. Following a review of Applicant and her clinical supervisor's ("CS") clinical supervision records, numerous issues were identified including the following:
 - a. Applicant and CS documented all of their supervision notes using a Board-approved template that had not yet been developed when Applicant and CS dated several of their supervision notes.
 - b. Despite having an 11/16 electronic creation date on the bottom-left corner of the form, several of Applicant and CS's notes are dated prior to the 11/16 effective date.
 - c. 82 of 113 notes were written entirely by Applicant, when R4-6-212 requires that clinical supervision documentation is completed and maintained by the clinical supervisor.
 - d. 41 of the 113 notes contain some degree of an obvious alteration such as:
 - The date of the session being altered.
 - The duration of the session being altered.
 - The dates of the signatures being altered.
 - e. 57 of the 113 notes are dated prior to 11/16, which is when the Board's supervision template was created.
 - f. 28 of the 113 notes were signed by CS approximately 1 ½ years after the date of the session.
 - g. Several of the supervision notes contain handwritten remarks by CS such as:
 - "Not submitted on this date."

- "This is not my handwriting."
 - "This is not my writing."
 - "This looks tampered on year."
- h. Furthermore, Applicant provided 124 printouts from her Google Calendar, which she represents was reflective of the dates their supervision occurred.
 - i. However, Applicant's Google Calendar contains 124 dates when there are 113 supervision notes.
3. In response to these issues, Applicant indicated the following:
 - a. Applicant would take her notepad and write down information regarding the session.
 - b. She would then go to her office and type that information into her Google Calendar for the date of their session.
 - c. She then discarded her original notepad notes.
 - d. Later, Applicant transferred the information from Google Calendar to the Board's supervision template.
 - e. On several of the supervision notes, Applicant incorrectly attributed an individual note when it was in fact a group note.
 - f. In other instances, Applicant used the Board's 11/16 supervision template and then backdated the forms.
 - g. Applicant intentionally backdated the supervision forms because she knowingly dated the forms the date that the session occurred rather than the date she signed.
 - h. When asked if she changed any of her hours from 1 to 2, Applicant indicated she changed it simply because she accidentally wrote a 1 instead of a 2.
 - i. When asked about the white-out, Applicant indicated, "I'm sure I did. I know in some cases I had boxes that were incorrectly marked...I know I used white out on some, absolutely."
 - j. The more she started looking at her clinical supervision notes, the more she realized the notes were deficient.
 - k. Applicant called CS panicked and asked her what she thought she should do to correct the issue and CS suggested that she request to withdraw her application.
 4. When considering the numerous issues associated with the supervision records such as 1/3 of the documentation containing alterations, numerous supervision notes incorrectly attributing to an individual note when it should have been a group note, the backdating of signatures, CS signing documents 1 ½ years after the fact, and CS providing statement such as, "this looks tampered on year," there appears to be no viable way to verify that clinical supervision actually occurred on the dates and times presented to the Board.

In addition, pursuant to A.R.S. § 32-3301, the Counseling Academic Review Committee determined that you did not establish qualifications for licensure based on the following:

1. You did not establish that you meet the supervised work experience as set forth in A.A.C. R4-6-503.
2. You did not establish that you meet the clinical supervision requirements as set forth in A.A.C. R4-6-504.

Per A.R.S. §41.1092.03.B, you may request a Formal Hearing by notifying the agency in writing within thirty-five (35) days from the date of this letter. If you do request a Formal Hearing, you also have the right, pursuant to A.R.S. §41-1092.06, to request a settlement conference. If you do not request a Formal Hearing by the close of business on November 26, 2018, your file will be closed without further recourse to appeal and the licensure denial will be reported to the federal data banks that record this information. If you desire licensure at a later date, you must submit a new application and fee.

PLEASE BE FURTHER ADVISED that, pursuant to the Board's licensure statute, as of July 1, 2004,

only persons holding licenses to practice counseling may do so unless they are exempt from licensure pursuant to A.R.S. § 32-3271.

If you have any questions, I can be reached at (602) 542-1617.

Sincerely,

A handwritten signature in black ink, appearing to read "Tobi Zavala". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tobi Zavala
Executive Director