

IN THE MATTER OF  
LAURA CAWLO, LCPC  
Respondent  
License No. LC2114

RECEIVED  
2011 MAR 15 P 12:00  
\* BEFORE THE STATE BOARD  
\* OF PROFESSIONAL COUNSELORS  
\* AND THERAPISTS  
\* Case Number: 2011-28  
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**CONSENT ORDER**

The State Board of Examiners of Professional Counselors and Therapists (the "Board") charged Laura Cawlo, LCPC (the "Respondent"), D.O.B. (11-25-74), License Number: LC2114, with violating certain provisions of the Maryland Professional Counselors and Therapists Act (the "Act"), Md. Health Occ. Code Ann. ("H.O.") § 17-101, *et seq.* (2009 Repl. Vol. & 2012 Supp.) and related regulations.

The pertinent provisions of the Act provides as follows:

**H.O. § 17-509. Denial, probation, suspension, or revocation of certificate applicant or holder.**

Subject to the hearing Provisions of § 17-511 of this subtitle, the Board on the affirmative vote of a majority of its members then serving, may deny a license or certificate to any applicant, place any licensee or certificate holder on probation, reprimand any licensee or certificate holder, or suspend or revoke a license of any licensee or a certificate of any certificate holder if the applicant, licensee, or certificate holder:

- (6) Willfully makes or files a false report in the practice of counseling or therapy;
- (7) Makes a willful misrepresentation while counseling or providing therapy;
- (8) Violates the Code of Ethics adopted by the Board;
- (9) Knowingly violates any provision of this title;
- (16) Commits an act of immoral or unprofessional conduct in the practice of clinical or nonclinical counseling or therapy [.]

The Board also charged the Respondent with a violation of its Code of Ethics, Code of Md. Regs. (COMAR) 10.58.03:

**.04. Ethical Responsibility**

A. A counselor shall:

- (2) Take credit only for professional work actually performed;
- (7) Maintain accurate records;

B. A counselor may not:

- (2) Participate in dishonest, fraudulent, or deceitful activity in the capacity of a counselor[.]

On Friday, January 25 2013, a Case Resolution Conference was convened regarding this matter. Present at the Case Resolution Conference was Debra A. Smith, Administrative Prosecutor, the Respondent, and Camilla J. Rogers, Esquire, Counsel for the Respondent. Based on negotiations which occurred as a result of this Case Resolution Conference the Respondent agreed to enter into this Consent Order, consisting of Findings of Fact, Conclusions of Law, and Order.

**FINDINGS OF FACT**

The Board makes the following findings of facts:

1. At all times relevant to the charges, the Respondent was and is licensed to practice as a licensed counselor in the State of Maryland.
2. The Respondent was originally issued a license to practice in the State of Maryland on November 28, 2005, and is currently licensed.

3. At all times relevant to the charges, the Respondent was employed as a counselor at Facility A,<sup>1</sup> an organization that provides counseling services to children and families.

4. The Respondent began employment at Facility A on or about April 2010.

5. On or about May 12, 2011, the Board received a complaint from an Administrator at Facility A, who stated that beginning in November 2010, the Respondent's supervisor noted that the Respondent was providing a higher volume of services to clients than other counselors employed at Facility A.

6. According to the complaint, as a result of the supervisor's observations and a review of the appointment logs and client sign-in sheets the supervisor discovered that the Respondent documented that she was providing services to clients at times during which the clients were not signed in on Facility A's client sign-in sheet, and/or not present at the Facility.

7. According to the complaint, a review of Facility A's security tape indicated that the Respondent documented the start of some counseling session by as much as fifteen minutes prior to the client's arrival at Facility A. The Complaint also alleged that the Respondent documented in some cases that she conducted a family session and an individual session, when only one session was provided during the indicated time slot.

8. As a result of these falsifications in the Respondent's billing records Facility A terminated the Respondent's employment on or about February 24, 2011.

9. Based on these allegations the Board opened an investigation.

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<sup>1</sup> Facility A is not identified in this document in order to protect the identity of Facility A. This information, however, will be provided to the Respondent upon request.

10. The Board requested pertinent records from Facility A, which were provided. A review of log sheets, billing records, sign in sheets, e-mail logs, and other information indicated that the Respondent documented that she was providing services to clients during times when the clients were not signed in, and/or not present at the Facility.

11. The records indicated that the Respondent falsely documented the start of some counseling session prior to the client's arrival at Facility A; scheduled overlapping appointments; documented that she was providing counseling services even though she was not physically present in the office where the counseling session was supposed to be held; documented that she was providing counseling services, during times where e-mail logs indicated that she was sending e-mails; and documented that she conducted more than one counseling session in the same time slot, when only one session was provided during the indicated time slot.

12. In furtherance of its investigation Board staff conducted an interview with the Respondent on or about December 29, 2011.

13. During the interview the Respondent stated that she did not realize that Facility A required that therapists document the exact "minute" of the beginning and ending time of counseling sessions. She claimed that she had worked at other facilities where therapists were allowed to estimate the beginning and ending time of counseling sessions.

14. The Respondent claimed that even if there were some discrepancies in the time the clients actually arrived at the Facility and the varying times she recorded in her records that she still provided each client with the required number of minutes of

counseling the client was scheduled to receive.

15. The Respondent, however, could not explain why she recorded overlapping times for client appointments in her records, and how she could have been providing client services while engaged in other tasks, such as sending out e-mails, or when she was not physically present in her office.

16. The Board's investigation determined that the Respondent falsified client billing records, by documenting counseling sessions with clients who had not arrived at the Facility and/ or signed in for therapy appointments , and by falsely recording times in her notes that indicated that she participated in counseling sessions with these clients.

17. The Board's investigation also found that the Respondent documented client sessions with more than one client or family where the session times overlapped and she could not have been providing counseling sessions to two different clients in the same time slot.

18. The Board's investigation determined that the Respondent documented that she was providing counseling services, during times where e-mail logs indicated that she was sending out e-mails; and at times when she was not physically present in her office, but in some other location in the building, such as the hallways.

#### **CONCLUSIONS OF LAW**

Based on the foregoing findings of fact the Board concludes as a matter of law that the Respondent's actions violated H.O. §§ 17-509 (6), (7), (8), (9), and (16), and COMAR 10.58.03.04A (2), (7), and B (2).

**ORDER**

Based on the foregoing Findings of Fact and Conclusions of Law, it is this 15<sup>th</sup> day of March, 2013, by a majority of the quorum of the Board considering this case hereby:

**ORDERED** that effective the date of this Consent Order, the Respondent's shall be placed on **PROBATION** for a period of **eighteen (18) months**, subject to the following terms and conditions:

**A. Supervision:**

1. During the first **ONE (1) Year** period of probation to begin on the date of execution of this Consent Order, the Respondent's counseling practice shall be supervised, at her own expense, by a Board-approved licensed mental health professional with experience and expertise in the field;
2. As part of the approval process, the Respondent shall submit to the Board the name and professional credentials of a licensed mental health professional to supervise her practice;
3. The Board-approved supervising licensed mental health professional shall notify the Board in writing of his/her acceptance of the supervisory role of the Respondent;
4. The Respondent shall provide the Board-approved licensed mental health professional with a copy of the charging document and this Consent Order, and whatever other written materials the Board deems

relevant;

5. The Respondent shall meet face to face with the supervisor **WEEKLY** for the first three (3) months; biweekly for the next six (6) months; and monthly for the last three (3) months of the one year supervisory period;
6. The supervision shall include particular attention to administrative counseling responsibilities, billing, documentation, and ethical financial standards;
7. The supervisor shall submit **QUARTERLY** reports to the Board detailing the ethical issues discussed and the Respondent's progress. The report shall include, but not be limited to, a report of the Respondent's participation in the supervisory process. Upon completion of the supervision period, the Respondent shall ensure that the supervising counselor submits a final report to the Board assessing the Respondent's practice;
8. The Respondent has sole responsibility for ensuring that the supervisor submits the required quarterly reports and the final report to the Board in a timely manner;
9. The Board has sole authority over any changes in supervision and must approve and ratify any changes in supervision or the frequency of supervision;
10. In the event that the Respondent's supervisor discontinues supervising the Respondent's practice for any reason during the 12-month supervisory period. The Respondent shall be solely responsible for submitting a replacement candidate to serve as her supervisor under the terms

specified above;

11. If the Respondent fails to complete the supervision in a timely matter as set out above, the Respondent will be deemed in violation of probation and this Consent Order; and
12. An unsatisfactory report from the Respondent's supervisor may constitute a violation of probation and of this Consent Order.

**B. Ethics Course:** The Respondent shall enroll in and successfully complete a 3-credit graduate level Board-approved course from an accredited college or university in professional, legal and ethical responsibility. The course may be an online course. The Respondent shall enroll in this required course within **twelve (12) months** of the date of this Consent Order. The Respondent shall submit the course description/syllabus to the Board for approval prior to enrolling in the course. The Board reserves the right to require the Respondent to provide further information regarding the course she proposes, and further reserves the right to reject the proposed course and require submission of an alternative proposal. The Board will approve a course only if it deems the curriculum and the duration of the course adequate to fulfill the Respondent's ethical needs.

**C.** The Respondent shall be responsible for all costs incurred in fulfilling this course requirement and for submitting to the Board written documentary proof of her successful completion of the course.

**D.** This course shall be in addition to any course required to satisfy the continuing education requirements for the applicable 2-year licensure renewal period.



E. The Respondent is responsible for ensuring that she completes the required ethics course in a timely manner; and it is further

**AND BE IT FURTHER ORDERED**, that the Respondent shall not petition the Board for early termination of her probation or the terms of this Consent Order; and it is further;

**ORDERED** that the Respondent's failure to comply with any of the conditions of this Consent Order in a timely manner as set out above, shall be considered a violation of this Consent Order; and it is further;

**ORDERED** that if the Respondent violates any of the terms and conditions of this Consent Order, the Board, in its discretion, after notice and an opportunity for an evidentiary hearing if there is a genuine dispute as to the underlying material facts, or an opportunity for a show cause hearing before the Board otherwise, may impose any other disciplinary sanctions that the Board may have imposed in this case, including additional probationary terms and conditions, reprimand, suspension, revocation and monetary penalty; and it is further

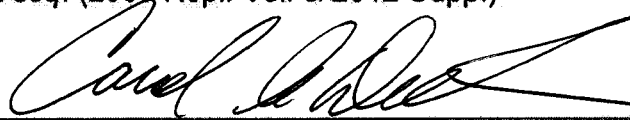
**ORDERED** that the Respondent shall comply with the Maryland Professional Counselors and Therapists Act and all applicable laws, statutes and regulations; and it is further

**ORDERED** that the Respondent may submit a written petition to the Board requesting termination of her probation no earlier than **EIGHTEEN (18) MONTHS** from the date of commencement of the probationary period, but only if she has fully and satisfactorily complied with all terms and conditions of this Consent Order, including all terms and conditions of probation, and including the expiration of the eighteen (18)

month period of probation, and there are any pending complaints against her related to the issues in this case; and it is further

**ORDERED** that the Respondent shall be responsible for all costs incurred in fulfilling the terms and conditions of the Consent Order; and it is further

**ORDERED** that this Consent Order is a **PUBLIC DOCUMENT** pursuant to Md. State Gov't Code Ann. § 10-611 *et seq.* (2009 Repl. Vol. & 2012 Supp.)



Carol A. Deel, LCPC, Board Chair  
Maryland Board of Professional Counselors  
and Therapists

**CONSENT**

I, Laura Cawlo, LCPC, License No. LC2114, by affixing my signature hereto, acknowledge that:

1. I have consulted with counsel, Camilla J. Rogers, Esquire, and I have knowingly and voluntarily elected to enter into this Consent Order. By this Consent and for the purpose of resolving the issues raised by the Board, I agree and accept to be bound by the foregoing Consent Order and its conditions.
2. I am aware that I am entitled to a formal evidentiary hearing, pursuant to Md. Health Occ. Code Ann. § 17-511(2009 Repl. Vol. & 2012 Supp.) and Md. State Gov't Code Ann §§ 10-201 *et seq.* (2009 Repl. Vol. & 2012 Supp.).
3. I acknowledge the validity and enforceability of this Consent Order as if entered into after the conclusion of a formal evidentiary hearing in which I

would have the right to counsel, to confront witnesses, to give testimony, to call witnesses on my own behalf, and to all other substantive and procedural protections as provided by law. I am waiving those procedural and substantive protections.

4. I voluntarily enter into and agree to abide by the terms and conditions set forth herein as a resolution of the Charges against me. I waive any right to contest the Findings of Fact and Conclusions of Law and I waive my right to a full evidentiary hearing, as set forth above, and any right to appeal this Consent Order or any adverse ruling of the Board that might have followed any such hearing.
5. I acknowledge that by failing to abide by the conditions set forth in this Consent Order, I may be subject to disciplinary actions, which may include revocation of my license to practice as a licensed professional counselor.
6. I sign this Consent Order voluntarily, without reservation, and I fully understand and comprehend the language, meaning and terms of this Consent Order.

03/13/13  
Date

3/13/2013  
Date

Laura Cawlo LCPC

Laura Cawlo, LCPC  
Respondent

Camilla J. Rogers

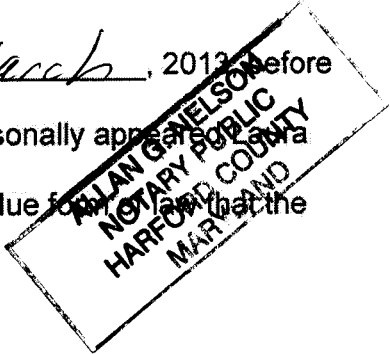
Camilla J. Rogers,  
Counsel for Respondent

**NOTARY**

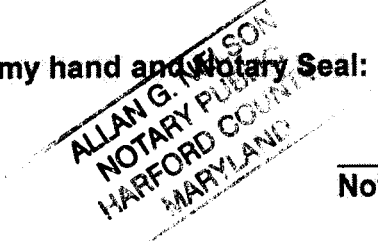
STATE OF Maryland

COUNTY OF Harford

I HEREBY CERTIFY that on this 13 day of March, 2013, before me, a Notary Public of the State and County aforesaid, personally appeared John Cawlo, LCPC, License Number LC2114, and gave oath in due form that the foregoing Consent Order was his voluntary act and deed.



AS WITNESS, my hand and Notary Seal:



AGN  
Notary Public Allan G. Nelson

My Commission expires: 6/16/15

