

no evidence that Respondent was exploiting clients. Rather, Mr. Schoener concluded that Respondent is a committed and hard-working practitioner who is well motivated.

4. Mr. Schoener did believe, however, that from a risk management perspective, Respondent's practice would be improved if she implemented certain recommendations. They are as follows:

- A. Document all case coordination with other professionals working with the client.
- B. Document in detail the decision-making which went into the decision to offer barter to a client, and document the specific structuring of the barter agreement, including how the Respondent weighed various factors.
- C. Provide a written and verbal explanation to the client about barter, including the risks of the arrangement.
- D. Request that all clients raise with Respondent any feelings that the barter agreement is not fair in terms of the exchange.
- E. Advise the client to notify the Respondent immediately if the client:
(i) learns anything about another client by seeing a document or record; (ii) overhears a conversation or tape which reveals information about another client; (iii) overhears a conversation or tape or reads a document that gives the client information about Respondent's personal life; (iv) feels the arrangement is no longer comfortable, or generates anxiety for the client, for any reason.
- F. Discuss the decision-making as documented in paragraph B with a professional colleague and make a record of the fact that the consultation occurred as to the decision to offer the option of barter to a client.
- G. Document a follow-up assessment as to the outcome of "taking" clients to events or to recovery group meeting as weighed against the goals for the client. The Respondent should recognize that the decision-making with respect to this activity is similar to the decision about the barter and requires the same professional and ethical analysis, but the Respondent's actual documentation may be a simple notation.

5. Respondent agrees to comply with Mr. Schoener's recommendations.
6. The recommendations from Mr. Schoener augment those contained in the Agreement and all terms, conditions, and restrictions contained in the Settlement Agreement and Final Order executed November 17, 2005, including but not limited to those contained in paragraphs ii, 12, 13, and 14, remain in full force and effect.
7. The Board's approval of this Agreement shall constitute a FINAL ORDER of the Board.

This stipulated order is approved by the board on November 6, 2006.