

# Understanding Long COVID:

## Implications for Vocational Rehabilitation Professionals

Virtual Mini Conference  
January 11, 2023



*Presented by:*





# Acknowledgement & Disclaimer

This training was developed with support from the: [Center for Innovative Training in Vocational Rehabilitation \(CIT-VR\)](#), funded under (#H263C190007) by the U.S. Department of Education, Office of Special Education and Rehabilitative Services (OSERS), Rehabilitation Services Administration (RSA).

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# Partners



**VRTAC-QM**



# Logistics



Microphone and Video



Active Participation




CRC Continuing Education



Evaluation



# Agenda

- ❖ **2:00 – 2:15 pm Welcome and Logistics**
  - ❖ **2:15 – 3:15 pm Part 1**
    - **Session 1:** From Epidemiology to Clinical Care
    - **Session 2:** Psychosocial Issues and the Provision of VR Services
  - ❖ **3:15 – 3:30 pm Break**
  - ❖ **3:30 – 4:50 pm Part 2**
    - **Session 3:** Legal and Service Delivery Dimensions
    - **Session 4:** Accommodations in the Workplace
    - **Session 5:** The Stigma of Long COVID: Ethical Implications for VR Professionals
  - **4:50 – 5:00 pm Wrap up and Adjournment**
- 

# Part 2

## **Session 3**

Legal and Service Delivery Dimension

## **Session 4**

Accommodations in the Workplace

## **Session 5**

The Stigma of Long COVID: Ethical Implications  
for VR Professionals

# Presenters



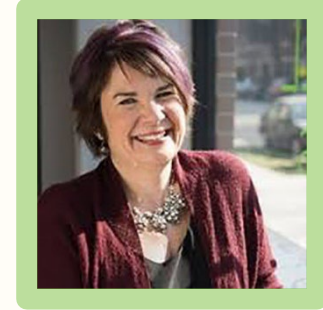
**RoseAnn Ashby, MEd**  
Rehabilitation Policy  
Consultant  
*Center for Rehabilitation  
Counseling Research  
and Education  
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University, Washington DC*



**Nichole Tichy, MA, CRC**  
Doctoral Candidate,  
Counseling and Human  
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*Center for Rehabilitation  
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**Tracie DeFreitas, MS**  
Director of Training,  
Services, and Outreach  
*Job Accommodation  
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**Linda Hedenblad, MSE, CRC**  
Senior Research Associate  
*Center for Rehabilitation  
Counseling Research  
and Education  
The George Washington  
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# Session 3

## Legal and Service Delivery Dimension

### **Your Presenters:**

- RoseAnn Ashby, MEd, Rehabilitation Policy Consultant, VRTAC-QM
- Nichole Tichy, MA, CRC, Doctoral Candidate

**Center for Rehabilitation Counseling Research and Education**  
**The George Washington University, Washington DC**





# Learning Objectives:

## Legal and Service Delivery Dimensions

- ✓ Explore the impact of Long-COVID on employment and the workforce.
- ✓ Describe circumstances under which Long COVID can be considered a disability under the Americans with Disabilities Act (ADA) and the vocational rehabilitation program.
- ✓ Discuss strategies that Vocational Rehabilitation counselors can use during the assessment process.



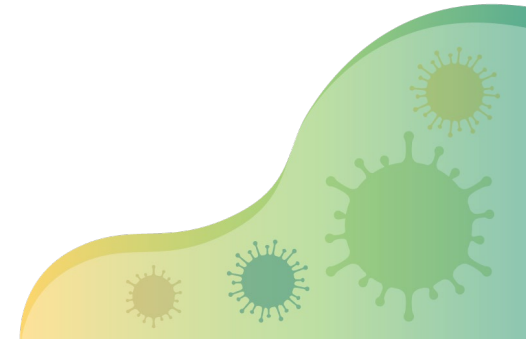


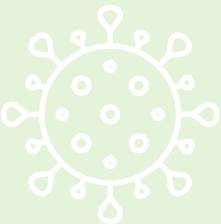
# Can Long COVID Be Considered a Disability?

**As of July 2021, Long COVID can be considered a disability under the following laws under certain circumstances:**

- The Americans with Disabilities Act (ADA),
- Sections 101 and 504 of the Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act
- Section 1557 of the Patient Protection and Affordable Care Act, and
- the Individuals with Disabilities Education Act (IDEA).

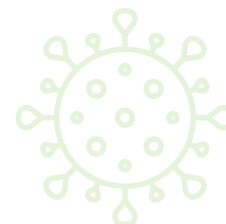
**Although the definitions of disability in these laws have some similarities, we must look at each law to understand the definition of disability that applies and to the implementing regulations for that law.**





# How is Long COVID Defined as a Disability Under the ADA and Section 504 of the Rehabilitation Act?

The definition of individual with a disability under Section 504 and the ADA is fairly broad. In July 2021, the Department of Justice and the Office for Civil Rights in the Department of Health and Human Services issued guidance that states that **individuals with Long COVID can be considered individuals with disabilities under Section 504 of the Rehabilitation Act and the ADA.** This broader definition can also be found in the VR program regulations in 34 C.F.R. § 361.5(c)(28), but it is not the definition applicable to determine VR eligibility.



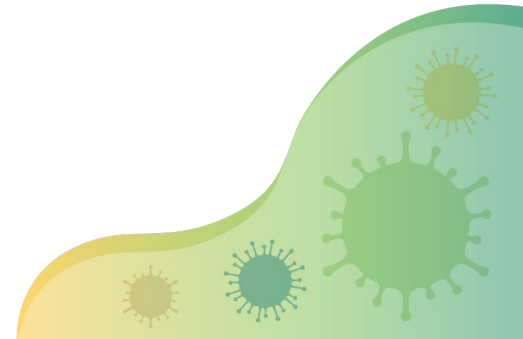


# Defining an Individual with a Disability Under the ADA and Section 504

**An individual with a disability is someone:**

- Who has a physical or mental impairment that substantially limits one or more major life activities;
- Who has a record of such an impairment; or
- Who is regarded as having such an impairment.

**Under Section 504 and the ADA, a person with Long COVID has a disability if they meet the first or second prongs of the definition.**





# Defining an Individual with a Disability under the ADA and Section 504: Physical or Mental Impairment

**The guidance issued by DOJ and HHS explains that Long COVID is a physical or mental impairment.**

- A physical impairment includes any physiological disorder or condition affecting one or more body systems, including, among others, the neurological, respiratory, cardiovascular, and circulatory systems.
- A mental impairment includes any mental or psychological disorder, such as an emotional or mental illness.

**Long COVID is a physiological condition affecting one or more body systems. For example, Long COVID can cause lung damage, heart damage, damage to the circulatory system, neurological damage, lingering emotional illness, and other mental health conditions.**

**Conclusion:** Long COVID is a physical or mental impairment under the ADA and Section 504.





# Defining an Individual with a Disability under the ADA and Section 504 – Substantial Limitations in Major Life Activities

## **“Major life activities”:**

- Include a wide range of activities, such as caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, writing, communicating, interacting with others, and working.
- Include the operation of a major bodily function, such as the functions of the immune system, cardiovascular system, neurological system, circulatory system, or the operation of an organ.

## **The term “substantially limits” is construed broadly under Section 504 and the ADA:**

- The impairment does not need to prevent or significantly restrict an individual from performing a major life activity;
- The limitations do not need to be severe, permanent, or long-term.
- Even if the impairment comes and goes, it is considered a disability if it would substantially limit a major life activity when the impairment is active.

**Conclusion:** Long COVID may cause substantial limitations in major life activities.

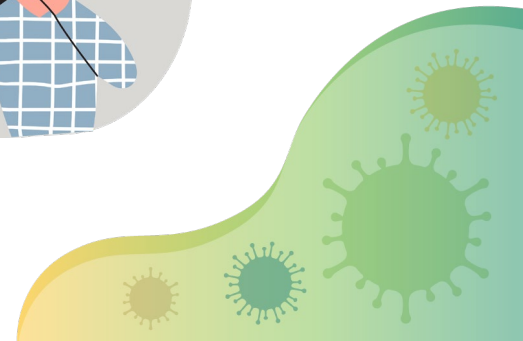




# Long COVID Examples

**The situations in which an individual with Long COVID might be substantially limited in a major life activity are diverse. Among possible examples, some include:**

- A person with Long COVID who has lung damage that causes shortness of breath, fatigue, and related effects is substantially limited in respiratory function and may be substantially limited in terms of walking, standing, bending, or lifting.
- A person with Long COVID who has symptoms of intestinal pain, vomiting, and nausea that have lingered for months is substantially limited in gastrointestinal function and may be substantially limited in terms of eating, sleeping, working.
- A person with Long COVID who experiences memory lapses and “brain fog” is substantially limited in brain function and may be substantially limited in terms of concentrating, learning, and/or thinking.







# What Are Individuals' Rights?

- People whose Long COVID qualifies as a disability are entitled to the same protections from discrimination as any other person with a disability under the ADA and Section 504.
- Put simply, they are entitled to full and equal opportunities to participate in and enjoy all aspects of civic and commercial life.
- For example, this may mean that businesses or state or local governments will sometimes need to make changes to the way that they operate to accommodate a person's Long COVID-related limitations.

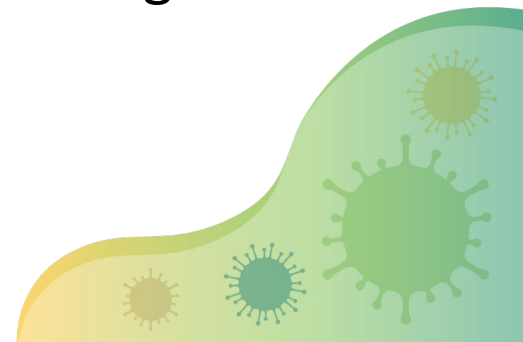




# Reasonable Accommodations

**For people whose Long COVID qualifies as a disability, these changes, or “reasonable modifications,” may include, for example:**

- Providing additional time on a test for a student who has difficulty concentrating.
- Modifying procedures so a customer who finds it too tiring to stand in line can announce their presence and sit down without losing their place in line.
- Providing refueling assistance at a gas station for a customer whose joint or muscle pain prevents them from pumping their own gas.
- Modifying a policy to allow a person who experiences dizziness when standing to be accompanied by their service animal that is trained to stabilize them.





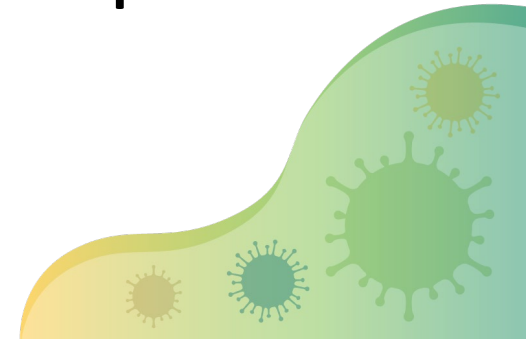
# How Is Long COVID Defined as a Disability in the VR Program for Purposes of VR Eligibility?

**Let's review the three prongs to the definition of individual with a disability for purposes of VR program eligibility, found in 34 C.F.R. § 361.5(c)(27).**

**To be eligible, the individual must be someone:**

- Who has a physical or mental impairment;
- Whose impairment constitutes or results in a substantial impediment to employment; and
- Who can benefit in terms of an employment outcome from the provision of VR services.

**Remember if someone meets the first two prongs of this definition, they are presumed to benefit from VR services (third prong).**



# Long COVID & VR Eligibility

The VR counselor must assess, on a case-by-case basis, whether an individual who presents with Long COVID meets the three prongs of the definition of individual with a disability for purposes of VR eligibility.

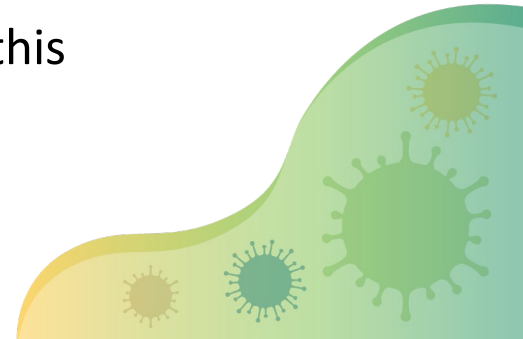
Particularly relevant here is the second prong of the definition; that is, **whether the individual's physical or mental impairments, caused by Long COVID, constitute or result in a substantial impediment to employment.** +





# Important Considerations in Assessment

- The VR counselor will need to gather medical documentation to determine the nature of the individual's impairments caused by Long COVID, how the individual's impairments affect their functioning, and the prognosis for the conditions, if known (how long the symptoms might last and whether they might improve).
- Such medical assessment would need to be conducted by qualified medical personnel.
- Based on this medical information and interviews with the individual, the VR counselor would then exercise professional judgment and determine how the impairments and the limits in functioning they create would affect the individual's ability to prepare for, secure, retain, advance in, or regain employment consistent with their unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice.
- Other underlying medical conditions the individual may have should be factored into this assessment.





# Let's Look at a Practical Example

- An individual presenting with Long COVID may be experiencing respiratory symptoms that have continued past the end of the acute illness.
- They may also be experiencing brain fog that did not occur while the person was acutely ill but became apparent after some of the initial COVID-19 symptoms abated.
- To further complicate the situation, the individual may have some other pre-existing disabling condition (e.g., a heart condition, diabetes, a physical disability) that, taken together with the Long COVID symptoms, makes their acquiring or retaining employment more challenging.
- The determination of the individual's eligibility for VR services must take into consideration all of these and similar factors and must be considered on a case-by-case basis.



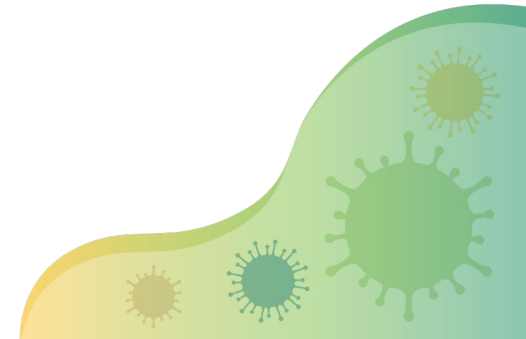


# What Services May Be Provided to Individuals with Long COVID?

**Once an individual with Long COVID is determined eligible for VR services, they may receive any service necessary to help them achieve an employment outcome.**

## **These individuals:**

- May not have worked prior to contracting Long COVID;
- May experience jeopardy regarding their continued employment because they have become unable to perform the functions of their job;
- May need training in order to acquire new skills necessary for another type of employment.





# A Note about Students with Disabilities

- According to guidance issued by the Department of Education in July 2021, a student experiencing Long COVID may be eligible for special education and related services under IDEA and/or may be entitled to protections and services under Section 504 of the Rehabilitation Act.
- Some students who were already identified as having a disability under IDEA and/or Section 504 and who have contracted COVID-19 may experience new or worsened symptoms related to their pre-existing disability, to COVID-19, or to both.
- May be potentially eligible and may benefit from pre-employment transition services, or
- may apply for VR services and be determined eligible to receive the full array of VR services, including pre-employment transition services, transition services, and other VR services, under an Individualized Plan for Employment (IPE).



# A Note about Coordination of Services

Importance of coordination of services given the multiplicity of needs individuals with Long COVID might experience.



# Session 4

## Accommodations in the Workplace

### Your Presenter:

- Tracie DeFreitas, Director of Training, Services, & Outreach,  
**Job Accommodation Network (JAN)**  
[AskJAN.org](http://AskJAN.org)



# Learning Objectives: Accommodations in the Workplace

- ✓ Discuss strategies for empowering consumers to request job accommodations under the Americans with Disabilities Act (ADA).
- ✓ Describe barriers and solutions for documenting Long COVID and related functional limitations for the purpose of requesting accommodations.
- ✓ Discuss possible accommodation solutions to address common functional limitations experienced by people with Long COVID.



# Long COVID and Employment

**Data shows long COVID is keeping as many as 4 million people out of work**

- Around 16 million working-age Americans (18 to 65) have long COVID today
- 2 to 4 million are out of work due to long COVID
- The annual cost of those lost wages alone is around \$170 billion a year (potentially as high as \$230 billion)

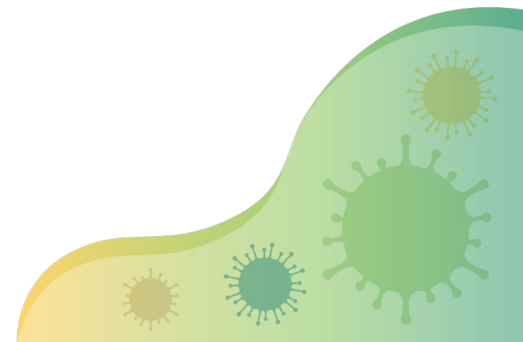
**Resource:** [Brookings Institution \(August 2022\)](#)





# How Rehabilitation Counselors Can Help

- Support consumers with long COVID in their effort to enter or return to the workforce
- Educate consumers about the Americans with Disabilities Act (ADA), the accommodation process, and Job Accommodation Network (JAN) resources
- Encourage consumers to leverage the ADA and request accommodations
- Advocate for and provide documentation to support accommodation requests



# Challenges

- Consumer concerns about disclosing medical condition and stigma.
- Lack of employer understanding of ADA requirements and how to support workers with long COVID.
- Lack of consistency in how long COVID is defined and diagnosed, directly impacting whether accommodations are provided.





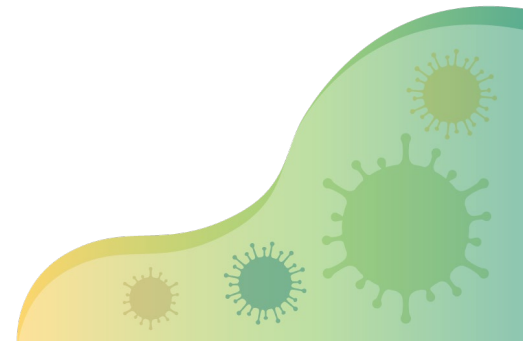


# Long COVID & the Amended ADA Definition of Disability

- Given the ADA's directive to construe disability broadly, err on the side of finding coverage if debatable.
- Focus on whether a reasonable accommodation can be provided.
- Remember employers are free to provide accommodations even if someone doesn't meet the ADA definition of disability.



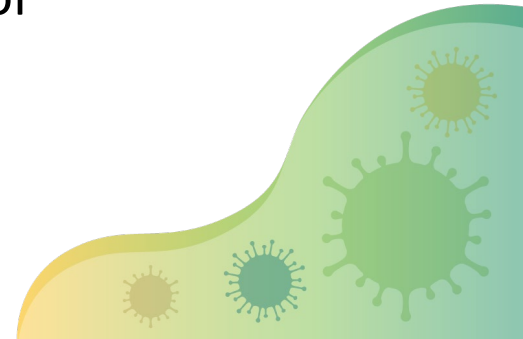
**Resource:** [What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws](#)





# Reasonable Accommodation

- An adjustment to a job or work environment that permits an applicant or employee with a disability to:
  - participate in the hiring process
  - perform the essential functions of a job, or
  - enjoy equal benefits and privileges of employment
- Reasonable means feasible or plausible—possible to provide without causing the employer undue hardship.
- Undue hardship is an action requiring significant difficulty or expense—unduly costly, extensive, substantial, or disruptive, or would fundamentally alter the nature or operation of the business.



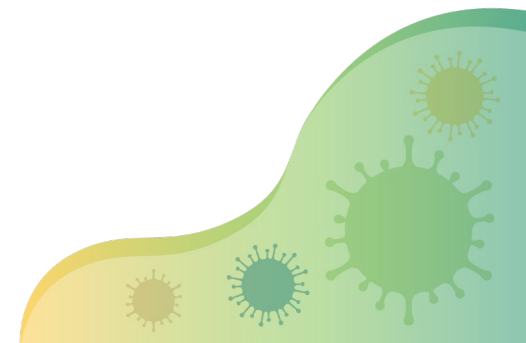


# Tips for Requesting Accommodation

- ✓ **Decide how to make the request** (e.g., face-to-face, email, formal letter, etc.)
- ✓ **Decide who to ask** (e.g., hiring manager, supervisor, human resources)
- ✓ **Explain why** the accommodation is needed
- ✓ **Offer accommodation solutions** and ask the employer to do this as well
- ✓ **Follow-up on the request** as needed
- ✓ If requested by the employer, **provide necessary medical information**
- ✓ **Monitor the accommodation** to make sure it's effective

## Resources:

- [Requesting and Negotiating a Reasonable Accommodation](#)
- [How to Request an Accommodation: Form Letter](#)



# AskJAN.org Resources: ADA, Long COVID, & Requesting Accommodations

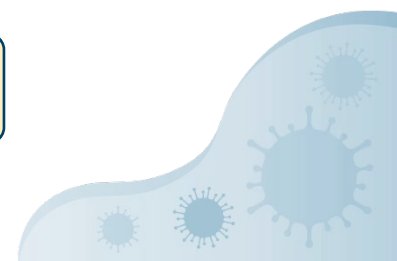
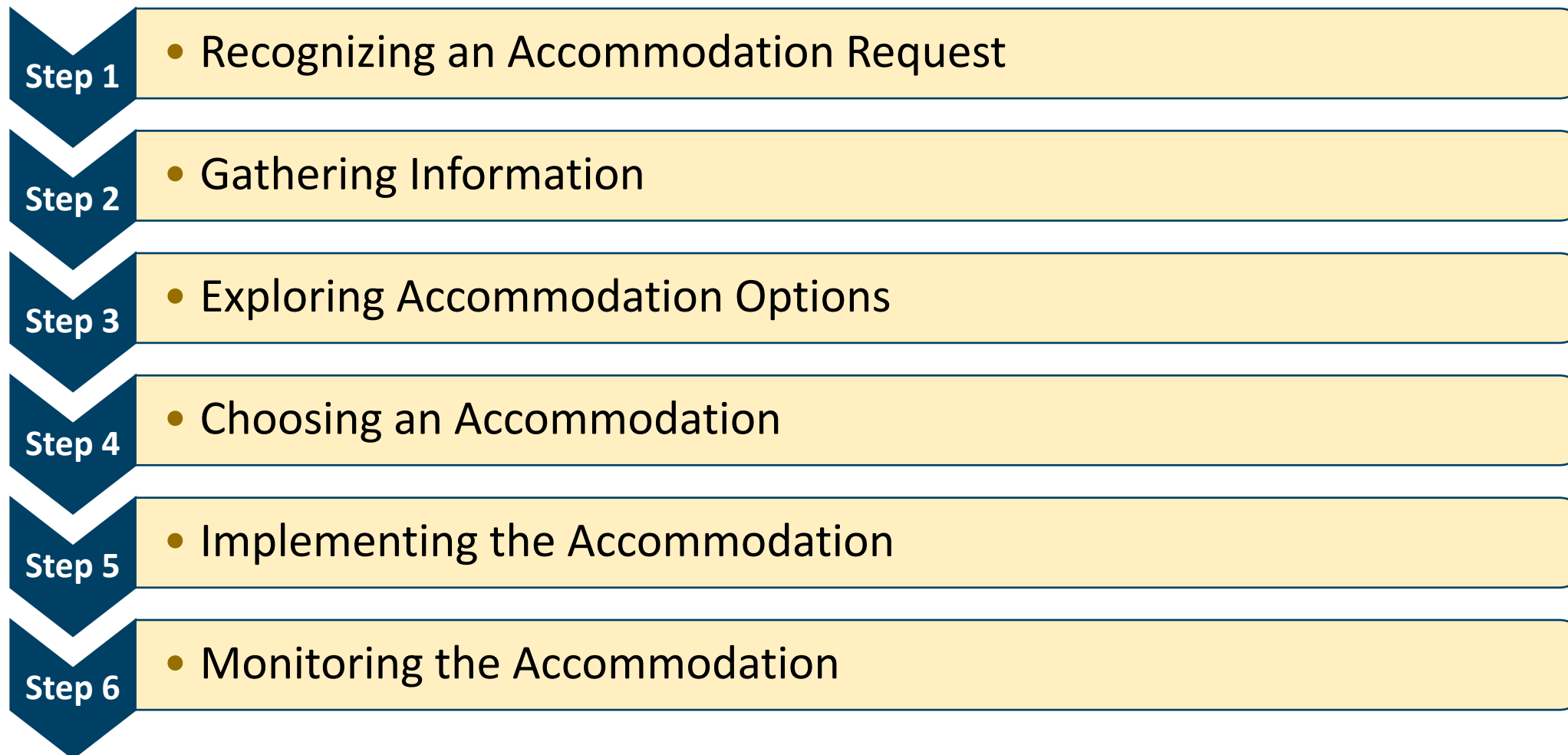
- [Long COVID and the ADA](#)
- [Disability Disclosure Topics](#)
- [Employees' Practical Guide to Requesting and Negotiating Reasonable Accommodation Under the ADA](#)
- [Requesting and Negotiating a Reasonable Accommodation](#)
- [How to Request an Accommodation](#)
- [Sample Language for Accommodation Request Letters](#)
- [Your Accommodation Request Was Denied. What Now?](#)





# Accommodation Process

**A process for collaboratively identifying accommodation solutions**



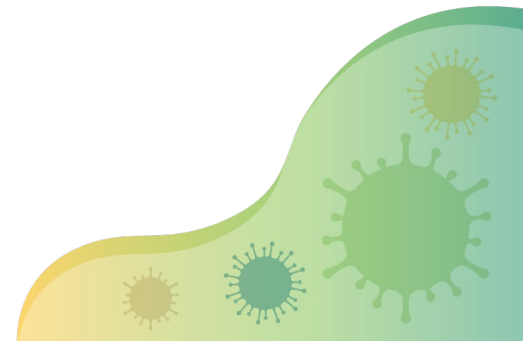


# Accommodation Process & Medical Documentation

- When the medical condition or need for accommodation is not obvious or already known, employer may request supporting documentation (e.g., information that might show the individual has a disability).
- Medical proof can be a barrier; focus on the functional limitations caused by long COVID and how accommodation will help.
- Rehabilitation counselor may be asked to provide supporting documentation.

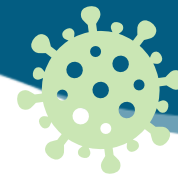
## Resources:

- [Reasonable Accommodation and Undue Hardship Under the ADA \(EEOC\)](#)
- [Medical Exams and Inquiries](#)
- [\\*Practical Guidance for Medical Professionals](#)



# Long COVID Symptoms/Functional Limitations

- Shortness of Breath
- Cough
- Extreme Fatigue
- Brain Fog
- Autonomic Dysfunction
- Headaches
- Insomnia
- Tachycardia
- Palpitations
- Muscle/Joint Pain
- Depression
- Anxiety
- Difficulty completing multiple tasks
- Difficulty reading and retaining information
- Difficulty speaking
- Inability to work without frequent breaks to rest
- Inability to sit or stand for long periods of time
- Limited mobility

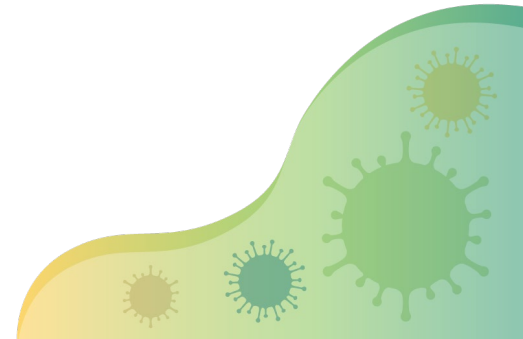






# Accommodations Are Not One-Size-Fits-All

- Impairments and limitations, as well as accommodation needs, are different based on the individual.
- Don't use a one-size-fits-all approach; have the full conversation.
- Beware of any assumptions in determining what an individual can or cannot do, or what accommodation is needed.
- Make individualized assessments based on actual limitations, work history, and current ability to perform functions with accommodation.



# AskJAN.org Resources: Long COVID Accommodation Solutions

- [Accommodation and Compliance: Long COVID](#)
- [Accommodating Employees with COVID-19 or Long COVID](#)
- [Supporting Employees with Long COVID: A Guide for Employers](#)
- [Accommodation Solutions for Executive Functioning Deficits](#)



# Solution:

## Short-Term or Trial Accommodations

- Suggest providing a short-term or trial accommodation solution; it might demonstrate whether the accommodation will be effective, or enable an employee to continue working/return to work.
- Shows good faith effort.

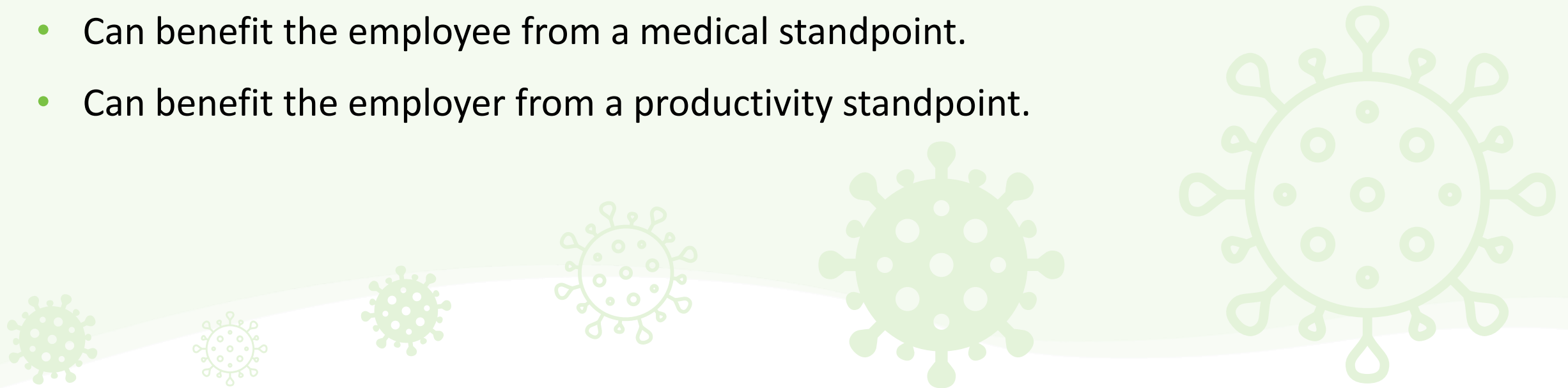
**Resource:** [Temporary or Trial Accommodations](#)



# Solution:

## Transitional and/or Modified Work Arrangements

- Transition back to full-time work over a short period.
- Modified/light duty is temporary or permanent work that is physically or mentally less demanding than normal job duties.
- No set requirement under the ADA to allow this.
- Can benefit the employee from a medical standpoint.
- Can benefit the employer from a productivity standpoint.



# Solution: Telework

- Check whether employer's usual telework policy covers the request before providing medical information.
- Whether continuing telework is a reasonable accommodation may depend on whether essential job functions changed or were removed during required telework.
- If telework was denied as an accommodation prior to the pandemic, the temporary telework experience can serve as a trial period that establishes whether telework is effective and reasonable.

**Resource:** [Telework Accommodation Request Tool](#)

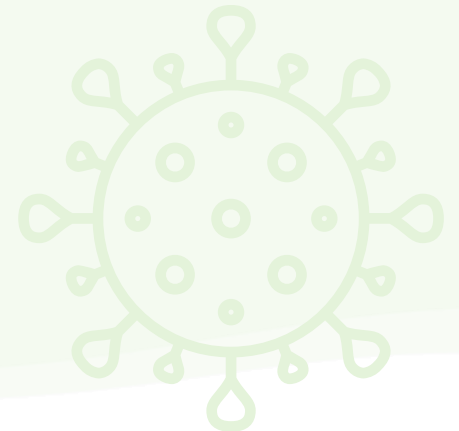
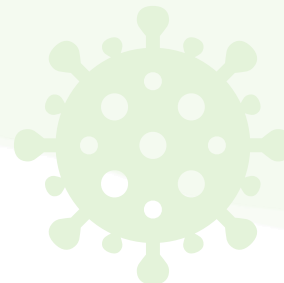


# Solution:

## To Address Difficulty Concentrating

- Reduce distractions in the work area
- Provide space enclosures or a private office
- Allow use of an environmental sound machine or a headset/earbuds to listen to music
- Increase natural lighting or provide full-spectrum lighting
- Reduce clutter in the employee's work environment
- Plan for uninterrupted work time
- Divide large assignments into smaller tasks and steps

**Resource:** [Executive Functioning Deficits](#)



# Solution:

## To Address Memory Deficits

- Written instructions and checklists
- Use a voice recorder
- Additional training time for new tasks
- Environmental cues for locations of items (e.g., labels, color coding, or bulletin boards)
- Training refreshers
- Minutes of meetings/trainings
- Flow-chart to indicate steps in a task
- Verbal or pictorial cues
- Color-coding scheme to prioritize tasks
- Notebooks, planners, or sticky notes to record information/as reminders of dates/tasks

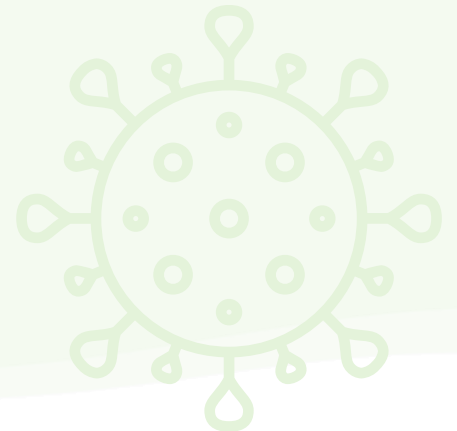
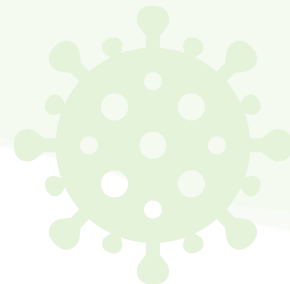
**Resource:** [Executive Functioning Deficits](#)



# Solution:

## To Address Fatigue/Difficulty Standing

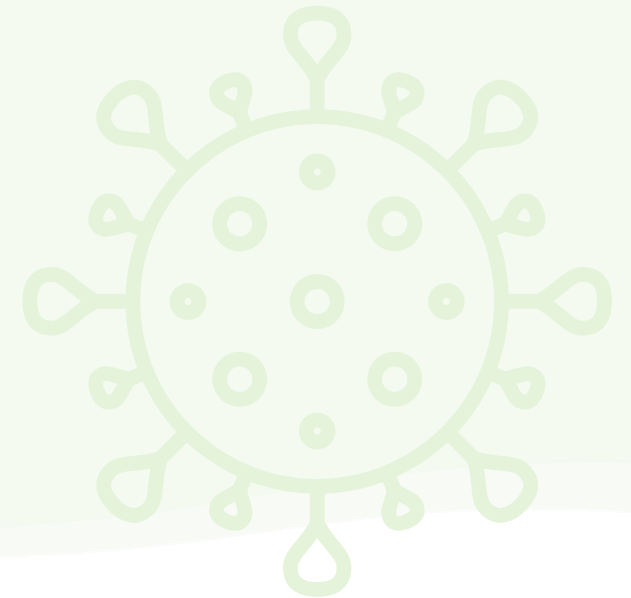
- Job restructuring
- Periodic rest breaks
- Reduced or flexible work schedule
- Allow telework
- Time for sitting if job requires a lot of standing
- Breaks to change position
- Adjustable Workstations
- Anti-Fatigue Matting, Wearable Anti-Fatigue Matting
- Stand-Lean Stools, Low Task Chairs





# Solution: To Address Anxiety

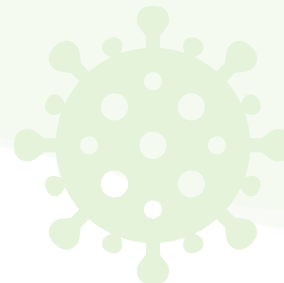
- Identify and reduce triggers
- Flexible schedule
- Modified break schedule
- Contact a support person when anxiety is triggered
- Rest area/private space
- Support animal
- Support person



# Solution:

## To Address Lifting Limitations

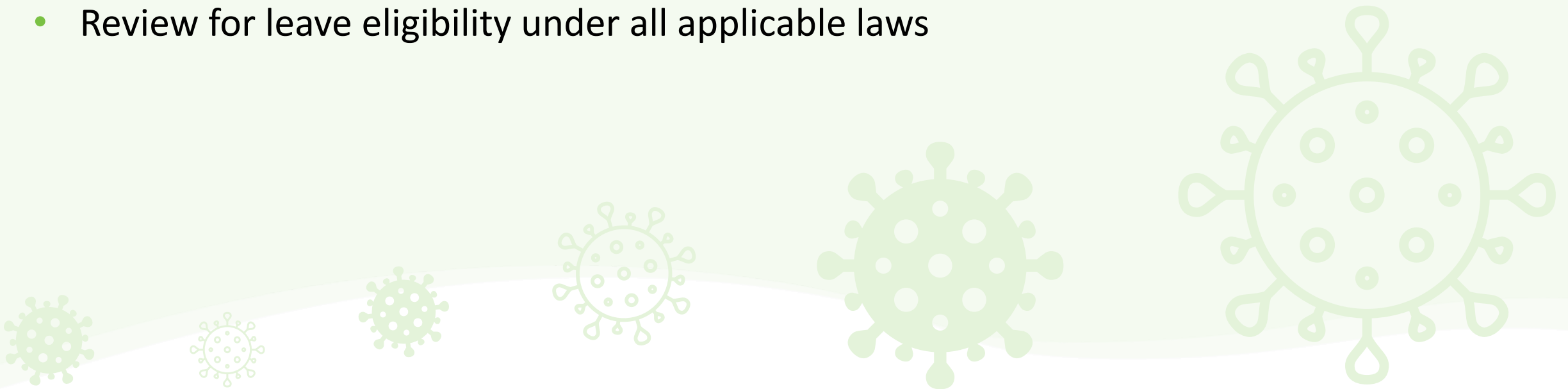
- Reallocate lifting duties if marginal
- Assist when moving objects/people, to reduce weight
- Organize items in a way that reduces the need to move items
- Place frequently used tools and supplies at or near waist height
- Reduce weight by separating items into smaller groups
- Use a compact material handling device to lift, push, pull
- Use a lift cart to move/raise items



# Solution:

## Leave

- ADA leave can be used continuously or intermittently
- If making up missed time later is not possible, leave can be used to cover time away
- Maximum leave under ADA is not a set amount like under the Family and Medical Leave Act (FMLA)
- Review for leave eligibility under all applicable laws



# AskJAN.org By Role, A to Z, ADA Library, Publications, Training Questions?

*Contact JAN for More Information*

**Visit:** AskJAN.org

**Call:** 800-526-7234 or 877-781-9403 (TTY)

**Chat:** @AskJAN.org

**Submit:** JAN on Demand Inquiry @AskJAN.org/JANonDemand.cfm

**Email:** [JAN@AskJAN.org](mailto:JAN@AskJAN.org)

**Social Media:** Facebook – Job Accommodation Network. Twitter - @JANatJAN





# Session 5

## The Stigma of Long COVID: Ethical Implications for VR Professionals

### Your Presenters:

- Linda Hedenblad, MSE, CRC, Senior Research Associate  
Nichole Tichy, MA, CRC, Doctoral Candidate  
Center for Rehabilitation Counselor Research and Education (CRCRE)  
The George Washington University



# Learning Objectives:

## The Stigma of Long COVID: Ethical Implications for Vocational Rehabilitation Professionals

- ✓ Examine the stigma behind Long COVID and its impact.
- ✓ Understand the impact of our personal bias.
- ✓ Explore ideas to reduce stigma and prejudice.



# University of Sussex Poll

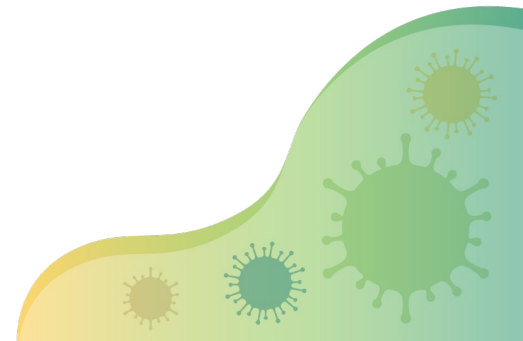
- 95% experienced at least one type of stigma "sometimes," with 76% experiencing it "often" or "always."
- 63% experienced stigma, such as people they care about stopping contact.
- 91% expected to experience stigma, such as assuming that others don't consider long COVID a real illness.
- 86% felt a profound sense of shame





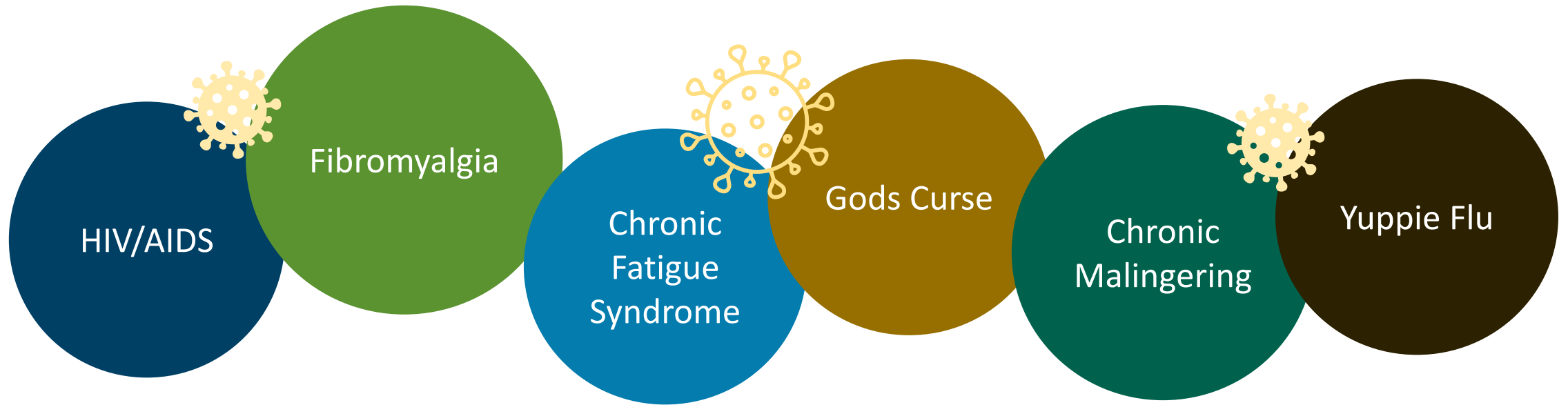
# Why Do Humans Stigmatize?

- Social Stigma
- Stems from fear and uncertainty
- History of discrimination against marginalized groups, including people with disabilities
- Fueled by the way we communicate
- Exacerbated by confusing symptomology





# Unprecedented and Yet...



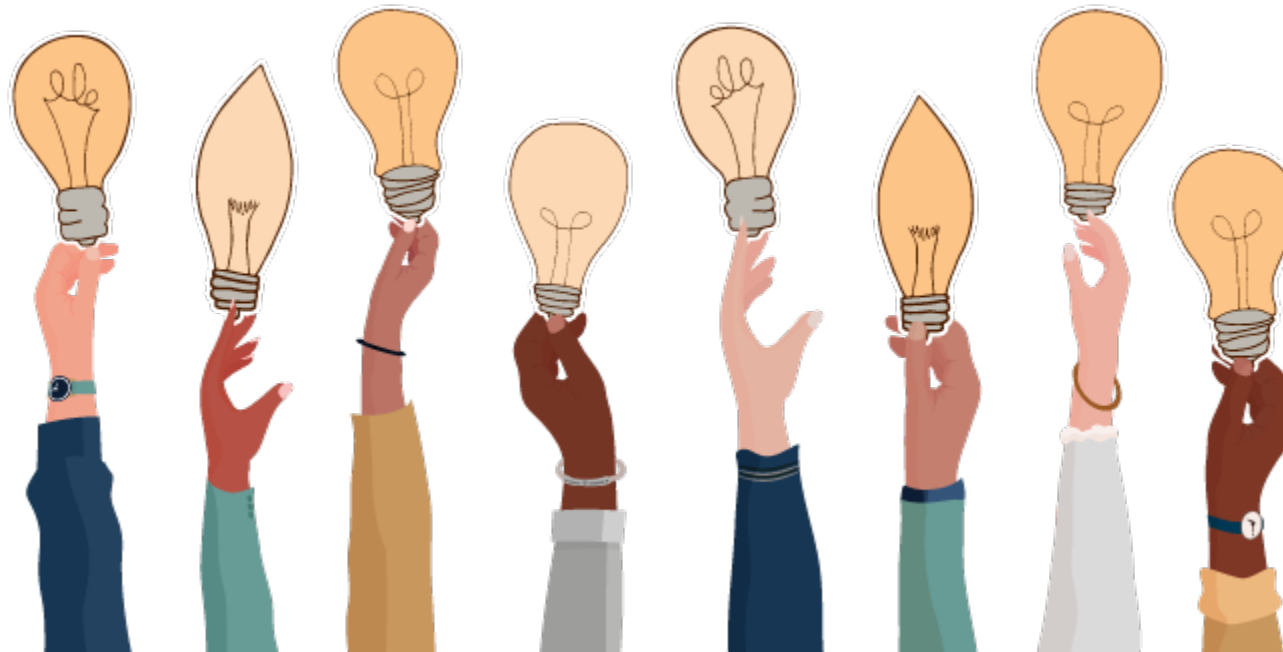
# Multicultural and Diversity Implications

- Persons with disabilities, largest minoritized population (Lund et al., 2020)
- Intersection of disability and poverty
- New Section D – Code of Ethics
- Trauma response



# Social Justice and Advocacy

- **What is it?**
  - Multicultural and Social Justice Counseling competencies (Ratts et al., 2015)
- **Why does it matter to counselors or other professionals?**
- **What does this have to do with long COVID?**
  - Ableism and Ageism



# Steps You Can Take



Know what Long Covid is... and isn't



Explore your personal feelings, experiences and beliefs



Examine the language you use



Express accurate empathy



Understand your ethical responsibility as a VR professional



Read the code of ethics



Advocate

The background is a light yellow color with a repeating pattern of stylized virus particles. Each virus particle is a yellow circle with numerous small, dark yellow spikes radiating from its surface. These particles are arranged in a grid-like pattern. Overlaid on this background is a large, white, irregular shape that resembles a stylized flower or a central void. The text "Thank you!" is centered within this white shape.

**Thank you!**

# References (Session 3)

- Long COVID: Under What Circumstances Is It a Disability? VR Technical Assistance Center for Quality Management. (retrieved 12/20/2022)
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- U.S. Department of Health Services. (2021). *Guidance on “long COVID” as a disability under the ADA, section 504, and section 1557*. <https://www.hhs.gov/civil-rights/for-providers/civil-rights-covid19/guidance-long-covid-disability/index.html>



# References (Session 4)

- New data shows long Covid is keeping as many as 4 million people out of work. Brookings Institute. August 24, 2022
- What You Should Know About Covid-19 and the ADA, the Rehabilitation Act, and Other EEO Laws. US Equal Employment Opportunity Commission. July 12, 2022
- Requesting and Negotiating a Reasonable Accommodation. Job Accommodation Network. Consultants' Corner Volume 03, Issue 04 (retrieved 12/20/2022)
- How to Request an Accommodation: Accommodation Form Letter. Job Accommodation Network. (retrieved 12/20/2022)
- Reasonable Accommodation and Undue Hardship under the ADA. US Equal Employment Opportunity Commission. (retrieved 12/20/2022)
- Medical Exams and Inquiries. Job Accommodation Network. (retrieved 12/20/2022)



# References (Session 4) continued

## AskJAN.org Resources

- [Long COVID and the ADA](#)
- [Disability Disclosure Topics](#)
- [Employees' Practical Guide to Requesting and Negotiating Reasonable Accommodation Under the ADA](#)
- [Requesting and Negotiating a Reasonable Accommodation](#)
- [How to Request an Accommodation](#)
- [Sample Language for Accommodation Request Letters](#)
- [Your Accommodation Request Was Denied. What Now?](#)





# References (Session 4) continued 2

## AskJAN.org Resources

- [Accommodating Employees with COVID-19 or Long COVID](#)
- [Supporting Employees with Long COVID: A Guide for Employers](#)
- [Accommodation Solutions for Executive Functioning Deficits](#)
- [Temporary or Trial Accommodations](#)
- [Telework Accommodation Request Tool](#)
- [Executive Functioning Deficits](#)



# References (Session 5)

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People with long COVID treated with less respect, feel shame and expect discrimination. Healthing. November, 2022
- [https://www. HowCommunicationWorks.Com](https://www.HowCommunicationWorks.Com)  
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- [Multicultural and Social Justice Counseling Competencies](#)



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