



COMMISSION ON REHABILITATION
COUNSELOR CERTIFICATION

Frequently Asked Questions (FAQs) and Guiding Statements to support Certified Rehabilitation Counselors (CRCs) Using Artificial Intelligence

Artificial Intelligence (AI) has the ability to enhance service delivery, but it must be used wisely and in accordance with client preferences. This document serves as a reference for Certified Rehabilitation Counselors (CRCs) to ensure informed ethical practices regarding the usage of AI in a professional capacity. As a reminder, it is essential to consult with your agency's policies and procedures regarding allowable practices and approved tools. These questions and statements were generated by the Commission on Rehabilitation Counselor Certification's (CRCC) Ethics Committee. Please note that any tools that are listed as examples are not necessarily endorsed by CRCC and one should not assume these have been properly vetted.

What is artificial intelligence?

- **Artificial Intelligence (AI)** is a field of computer science dedicated to developing systems that can perform tasks typically requiring human intelligence. These tasks include learning from data, reasoning, solving problems, understanding language, perceiving the environment, and making decisions. At its core, AI often relies on mathematical models, such as linear regression and other predictive algorithms, that analyze patterns in data to generate insights and anticipate outcomes.
- **Large Language Models (LLMs)** are AI models trained on vast amounts of text data to understand, generate, and manipulate human language. They use deep learning (especially transformer architecture) to predict the next word in a sentence, enabling them to carry out tasks like summarization, translation, and conversation. Examples include platforms such as ChatGPT, Claude, and Gemini.
- **Generative AI** is a broader category of AI that creates new content such as text, images, audio, or video, based on patterns in training data. Rather than analyzing or classifying, generative AI produces outputs such as essays, responses, lesson plans, or therapy scripts. Examples include platforms such as DALL-E, ChatGPT, and Sora.
- **Machine learning** is a branch of artificial intelligence that enables systems to learn from data and improve over time without being explicitly programmed. Instead of following fixed rules, these systems adapt based on experience. Examples can include MyInterview, Pymetrics (platforms used to help with matching job seekers to opportunities), and SARAWorks.
- **Deep Learning** is subset of machine learning involving neural networks with multiple layers ("deep" structures) that allow for complex pattern recognition in data. These tools can be especially effective for image and speech recognition, natural language processing, and time-series prediction. Examples can include speech-to-text software, emotion recognition tools/software, and predictive analytics.
- **Natural Language Processing (NLP)** is a branch of artificial intelligence that enables computers to understand, interpret, and generate human language. By combining linguistics, machine learning, and deep learning, NLP allows systems to work with text and speech data in meaningful ways. Key steps in NLP include understanding and analyzing text, processing

its meaning, and generating appropriate responses, making it possible for machines to communicate more naturally with people. Examples include Wordtune, VMock, and TMIND.

- **Agentic AI** refers to artificial intelligence systems that go beyond simply responding to user prompts and are capable of taking goal-directed actions on their own. Unlike traditional generative AI models, which are reactive and produce outputs only when asked, agentic AI systems can plan, act, and adapt in pursuit of a defined objective. They are able to break a larger goal into smaller steps, execute actions such as retrieving data or interacting with external systems, learn from outcomes, and adjust their approach over time. This makes them more like proactive collaborators than passive tools. For example, an agentic AI might automatically monitor progress toward a client’s vocational goals, flag potential issues, and suggest interventions, all without needing a prompt for each step. Because these systems act with a degree of autonomy, they raise important considerations around safety, ethics, transparency, and user control, ensuring that their actions remain aligned with human intentions and values.
- **Counseling-specific AI-related tools** are often administrative tools used to support the counseling process and ease the burden of administrative tasks. Many tools being used in this capacity incorporate various components of Artificial Intelligence, making it essential for counseling professionals to become familiar with AI-related terms prior to using supports and tools, including but not limited to: Mentalyc, ScribeNote, DeepScribe, Eleos Health, Ambient AI, or others that might be integrated into an electronic health record (EHR).
 - **AI Note-Taking Tool:** Software that uses AI to automatically generate progress notes or session summaries based on counselor input or audio transcription. AI note-taking tools generally use:
 - **Speech-to-text AI** to capture dialogue.
 - **Large language models (LLMs)** to interpret, structure, and summarize content.
 - **Pattern-recognition models** to identify clinical themes, interventions, or risk cues.
 - **Data security frameworks** (e.g., encryption, HIPAA-aligned practices).
 - Some tools (e.g., Mentalyc) do not record audio but instead use the counselor’s manual summary as input, reducing privacy concerns while still generating structured notes.
 - **AI Transcription Tool:** AI that converts spoken language to written text and may optionally summarize or structure it for clinical documentation.
 - **AI Clinical Documentation Assistant:** A broader term referring to AI systems that help counselors create, edit, and organize required documentation (notes, treatment plans, authorizations).

How do I ensure confidentiality when using AI?

- For Public-Facing AI tools as opposed to an agency generated tool one of the key aspects of ensuring confidentiality is anonymity. If the information cannot be anonymized, then it should not be entered into a **public-facing AI tool** (e.g., ChatGPT). It should be assumed that any client data entered is immediately compromised and is no longer confidential. This means stripping out all Protected Health Information (PHI) and Personally Identifiable Information (PII; e.g., names, addresses, detailed medical history) before feeding documents into the AI. Only use the minimum necessary, de-identified data required for the task.
- Secondly, you must only use HIPAA-compliant systems that your agency has thoroughly vetted and that have signed a Business Associate Agreement (BAA). These verified systems are legally

obligated to protect client data and should not be used to train their public models. Never use unverified, public-domain AI for client work.

- Finally, uphold the principle of Informed Consent. As a Certified Rehabilitation Counselor you must be transparent and inform the client that AI is being used, how their (anonymized) data will be processed, and who will have access to the output, ensuring the client maintains the right to opt out of the process.
- A word of caution – confidentiality can never be fully guaranteed through any database or system. It is important to acknowledge the risk of security breaches anytime technology is used.

What does data security mean in terms of AI usage?

- Data security in AI usage refers to the comprehensive measures required to protect client information throughout its lifecycle with an AI system, from input to output. This includes technical safeguards like data encryption (making data unreadable to unauthorized parties) and strict access controls (limiting who can view or use the data). It also involves adhering to regulations like HIPAA by using only vendor tools with a signed Business Associate Agreement (BAA), ensuring client information is not used to train the public AI model, and practicing data minimization, which means collecting and processing only the absolute minimum information necessary for the AI's task

How can I use AI tools with my clients/consumers/participants?

- AI tools can serve as powerful efficiency and discovery aids, but should never replace counseling. Tools can be used in a collaborative manner, and you can use AI for tasks like:
 - **Job Market Analysis:** Quickly summarizing local job trends, required skills for a specific occupation, or salary data.
 - **Document Drafting:** Generating initial drafts of resumes, cover letters, or job descriptions based on client input and past documents (ensuring all client-identifying data is removed first).
 - **Skill/Credential Matching:** Identifying potential career paths or necessary certifications by analyzing a client's anonymized existing skills and linking them to current market demand.
- Caution – be sure that the use of AI has been vetted and approved by your agency or organization. It is important to become familiar with tools and seek supervision or support prior to use with a client/consumer/participant.
- Reminder – informed consent and informed decision-making are crucial for client empowerment. As Certified Rehabilitation Counselors, we respect the decisions of clients to engage in the use or non-use of AI in the counseling process.

How can I support my clients/consumers/participants in developing AI literacy?

- The best way to support clients is through transparent education and open discussion. It can be important to first discuss AI's Role and explore what the individual wants to gain from their AI usage.
 - Engage in open, non-judgmental dialogue to explore how clients are using AI and what supports are necessary to ensure safety. Clients/consumers/participants often seek guidance from their counseling support systems and therefore it can be important to serve

as a model. Don't just use AI; show the client the results and explain where the data came from.

- Discuss that AI is a tool, not an expert. As part of the informed decision-making and consent process, it's necessary to highlight the limitations of AI usage. Teach clients, in plain language, that AI can be biased, can make errors, and only offers suggestions, not final truths. Encourage the client to evaluate AI suggestions against their lived experience, personal values, and unique goals. The client should feel empowered to challenge or reject an AI-generated idea (e.g., a job match that seems too restrictive).

What is AI Literacy?

- AI Literacy is the competency to effectively and ethically use, understand, and critically evaluate the strengths and limitations of AI technologies. For clients, it means understanding how AI processes information (e.g., that it's pattern-matching, not "thinking"), recognizing its potential for bias, and knowing how their personal data is affected when interacting with AI systems.

How can counselors develop AI literacy skills?

- We recommend that counselors treat AI literacy as an essential part of Continuing Professional Development (CPD), as it aligns with the Code of Professional Ethics specific to Professional (Section E.1) and Functional (Section E.2) Competence. This involves:
 - **Foundational Knowledge:** Seeking training to understand the basic mechanics of the AI tools used in the agency, such as knowing how the models are trained (i.e., patterns vs. thinking), their specific capabilities, and their ethical risks (e.g., bias, data security).
 - **Critical Evaluation:** Actively applying ethical principles (Justice, Nonmaleficence) to every AI output. This means critically checking job matches for algorithmic bias or confirming the accuracy of labor market data before sharing it.
 - **Prompt Engineering:** Learning how to give clear, ethical instructions (prompts) to AI tools to elicit the most useful, least-biased results, and to specify the data that should not be included.
 - **Policy Compliance:** Staying current with organizational and professional guidelines on AI use, confidentiality, and vendor compliance (e.g., HIPAA/BAA).

What are some of the limitations of AI?

- Key Limitations include:
 - **Algorithmic Bias:** AI systems are trained on historical data, which often reflects and perpetuates societal and structural biases (e.g., gender, race, disability status). AI outputs reflect the biases present in their training data, potentially leading to unfair or inequitable recommendations that limit opportunity for marginalized groups.
 - **Inaccuracy ("Hallucinations"):** AI can confidently generate factually incorrect, false, or nonsensical information (e.g., inventing job requirements, citing non-existent research, or providing inaccurate salary data).
 - **Lack of Empathy and Clinical Context:** AI cannot understand human nuance, emotion, lived experience, or the complex, systemic barriers faced by individuals with disabilities. It is merely a pattern-matching tool, not a human clinician.
 - With this limitation it is also important to acknowledge that at increasing rates, people are turning to AI chatbots and other tools for social connectedness.

- **Sycophancy (Overly Eager to Please):** Modern AI models are often programmed to be helpful, sometimes to a fault. This can lead them to confirm or reinforce the user's existing biases, goals, or expectations without providing a critical challenge or presenting alternative, fact-based perspectives, which is a core function of counseling.

How are people using AI effectively? OR What are the benefits in using AI?

- AI's main benefits are efficiency, expanded discovery, and reduced administrative burden.
 - **Increased Counselor Capacity:** Automating rote administrative tasks (like drafting routine emails or summarizing generic reports) frees up counselor time for direct, high-quality client interaction.
 - **Enhanced Job Exploration:** AI can quickly scan vast amounts of labor market data, suggesting novel or non-obvious career pathways that a counselor might not have manually considered.
 - **Objective Analysis:** When used properly, AI can provide objective data on skills gaps or educational needs based purely on market requirements, informing the client's training plan.
 - **Clinical Documentation and Note-Taking: "Closed"** AI platforms are being utilized in clinical spaces to support transcription of meetings, client meetings, and clinical note-taking.

How do we safeguard clinical decision-making?

- As Certified Rehabilitation Counselors, we safeguard clinical decision-making by enforcing Human Oversight and Clinical Judgment. The counselor must always maintain the final authority and accountability for all decisions. AI outputs must be treated as suggestions and data points, never as directives. Before any action, we must critically evaluate the AI's output against professional ethical standards, our knowledge of the client, and established VR best practices.

How can we effectively use ethical decision-making models?

- Ethical decision-making models should guide professionals in navigating AI-related decisions. When an AI-related ethical dilemma arises, practitioners should begin by consulting the Code of Professional Ethics (2023) to critically review and identify the relevant standards to inform their judgment. After grounding the issue in the appropriate ethical guidelines, CRCs are encouraged to apply a structured decision-making model, such as the framework outlined by Corey, Corey, Corey, & Callanan (2014), to evaluate options and determine an ethical course of action.
 - Recognizing the problem
 - Collaborating with the client to define the problem
 - Developing solutions with the client
 - Reviewing the process with the client and re-choose
 - Implementing and evaluating with the client
 - Continuing reflection
- **Consult supervisors or colleagues** to gain multiple perspectives and strengthen decision defensibility.
- **Prioritize the client's autonomy and values**, using accessible communication and supported decision-making when needed.

- **Document every step** of the model, including the dilemma, Code standards used, consultations, options, and final rationale.

What is the best practice in terms of ensuring informed consent?

- Best practice requires Active, Specific, and Ongoing consent.
 - **Transparency:** Clearly explain, in plain language, that AI is being used, what data is going into it (stressing when it is anonymized and when it is not), and what the AI is expected to produce.
 - **Autonomy:** Confirm that the client understands their right to opt out of the AI-assisted process without penalty.
 - **Documentation:** Document the discussion, the client's understanding, and their consent in the case file. This is not a one-time event; consent should be revisited if the AI tool or its use changes significantly.