

Ronald Narain  
900 Cathedral Street, Apt. 401  
Baltimore, Maryland 21201

10. 22. 2018

Date

Risa Ganel, LCMFT, Chair  
Board of Professional Counselors and Therapists  
4201 Patterson Avenue  
Baltimore, Maryland 21215

Re: Surrender of Licensed Clinical Alcohol and Drug Counseling (LCADC)  
License  
License Number: LCA 398  
Case No. 2015-064

Dear Ms. Ganel and Members of the Board:

Please be advised that I have decided to surrender my license to practice Clinical Alcohol and Drug (LCAD) Counseling<sup>1</sup> in the State of Maryland, License Number LCA398. I understand that I may not give LCAD advice or treatment to any individual, with or without supervision and/or compensation, cannot practice LCAD counseling or otherwise engage in the practice of clinical alcohol and drug counseling as it is defined in the Professional Counselors and Therapists Practice Act (the "Act"), Md. Code Ann., Health Occupations (Health Occ.) §§ 17-101, *et seq.*, (2014 Repl. Vol. and 2017 Supp.). In other words, as of 10. 22. 2018, the effective date of this Letter of Surrender, I understand that the surrender of my license means that I am in the same position as an unlicensed individual.

I understand that this Letter of Surrender is a **PUBLIC** document.

My decision to surrender my license to practice LCAD counseling in Maryland has been prompted by an investigation of my licensure by the Maryland Board of Professional Counseling and Therapists (the "Board").

The Board's investigation resulted in Charges under the Act. Specifically, the Board charged me with the commission of prohibited acts under Health Occ. §17-509, as follows:

---

<sup>1</sup> §17-101.

(a) In this title the following words have the meanings indicated.

(s) "Practice clinical alcohol and drug counseling" means to engage professionally and for compensation in alcohol and drug counseling and appraisal activities by providing services involving the application of counseling principles and methods in the diagnosis, prevention, treatment, and amelioration of psychological problems and emotional or mental conditions of individuals or groups

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:

- (4) Aids or abets an unauthorized individual in practicing clinical or nonclinical counseling or therapy or representing to be an alcohol and drug counselor, marriage and family therapist, professional counselor, or professional art therapist;
- (8) Violates the code of ethics adopted by the Board;
- (9) Knowingly violates any provision of this title;
- (13) Violates any rule or regulation adopted by the Board;

The pertinent provisions of the Code provide:

COMAR 10.58.03

.04 Ethical Responsibility.

A. A counselor shall:

- (7) Maintain accurate records;
- (8) Provide supervision to supervisees as required under COMAR 10.58.01, 10.58.07, and 10.58.08; [and]

COMAR 10.58.03.

4B. A counselor may not:

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

I affirm that I was served with a copy of the charging document and have otherwise been advised on the Board's actions through communications with representatives of the Office of the Attorney General. As a result of those Charges, I attended a Case Resolution Conference on May 1, 2017 and, subsequently, entered into a Consent Order with the Board which stated, *inter alia*, the following.

I was charged with failure to ensure that a trainee was properly supervised, as more fully set forth in the attached Consent Order, dated May 12, 2017. That Consent Order placed me on Probation for a period of a least one-year subject to the following terms and conditions, *inter alia*:

1. The Respondent shall enroll in and complete a Board-approved ethics course. The Respondent shall be solely responsible for furnishing the Board with adequate written verification that he has completed the above-referenced course according to the terms set forth herein. The Respondent may not use any continuing education credits earned through such coursework to fulfill any continuing education requirements that are mandated for licensure renewal in this State[;].

On May 14, 2018, I wrote the Board informing it that that I had not completed the "Ethics Course" that was required during my Probation. By letter dated August 2, 2018, I informed the Board that I decided to "give up my license".

I have decided to surrender my license to practice LCAD counseling in Maryland to avoid further prosecution of the aforementioned violation of Probation or other Charges. The basis for the Charges against me include the findings of the investigations described above, and by virtue of this Letter of Surrender, I waive any right to contest those Charges and findings. I wish to make it clear that I have voluntarily, knowingly and freely chosen to submit this Letter of Surrender. **I understand that by executing this Letter of Surrender, I am waiving any right to contest these findings in a formal evidentiary hearing at which I would have had 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 provided by law, including the right to appeal.**

I hereby affirm that I have permanently terminated any practice that I had in Maryland.

I acknowledge that on or before the effective date of this Letter of Surrender, I shall present to the Board my Maryland LCAD license, number LCA398, including any renewal certificates and wallet-sized renewal cards.

I understand that the Board will advise any applicable National Data Bank of this Letter of Surrender, and, in any response to inquiry, that I have surrendered my license in lieu of additional disciplinary action under the Act as resolution of the matters pending against me. I also understand that, in the event I would apply for licensure in any form in any other state or jurisdiction, this Letter of Surrender, and all underlying documents, may be released or published by the Board to the same extent as a Final Order that would result from disciplinary action pursuant to Md. Code Ann., Gen. Prov., §§ 4-101, *et seq.*

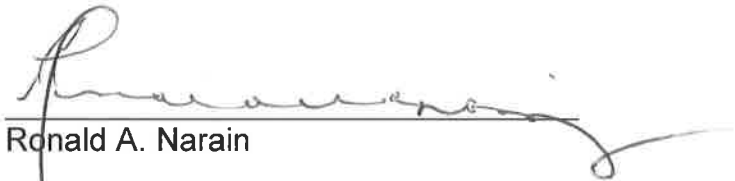
Risa Ganel, LCMFT, Chair  
and Members of the Board  
Page 4

(2014 Vol. and 2017 Supp.).

I further recognize and agree that, by agreeing to this Letter of Surrender, my license will remain surrendered forever. In other words, I agree never to apply for reinstatement of my LCAD license in the State of Maryland.

I acknowledge that I may not rescind this Letter of Surrender, in part or in its entirety, for any reason whatsoever. Finally, I wish to make clear that I have knowingly and voluntarily waived my right to consult with an attorney before signing this Letter of Surrender. I understand both the nature of the Board's actions and this Letter of Surrender fully. I acknowledge that I understand and comprehend the language, meaning and terms and effect of this Letter of Surrender. I make this decision knowingly and voluntarily.

Sincerely,

  
Ronald A. Narain

**NOTARY**

STATE OF Maryland  
CITY/COUNTY OF Baltimore City.

I HEREBY CERTIFY that on this 22 day of October, 2018,  
before me, Tsion Assefa, a Notary Public of the State and City/Country  
(Print Name)  
aforesaid, personally appeared **Ronald Narain** and declared and affirmed under the  
penalties of perjury that signing the foregoing letter of surrender was his voluntary act  
and deed.

AS WITNESS my hand and notarial seal.

  
Notary Public



My Commission expires: 9-6-2019.

Risa Ganel, LCMFT, Chair  
and Members of the Board  
Page 5

**ACCEPTANCE**

**ON BEHALF OF THE BOARD OF PROFESSIONAL COUNSELORS AND  
THERAPISTS**, on this 25<sup>th</sup> day of October, 2018, I accept Ronald  
Narain's public Letter of Surrender of his license to practice LCAD in the State of  
Maryland.



---

Risa Ganel, LCMFT, Chair  
Board of Professional Counselors and  
Therapists

cc: Nicholas Johansson, Principal Counsel  
Roberta Gill, AAG, Administrative Prosecutor  
Rhonda Edwards, AAG, Board Counsel  
Kimberly Link, J.D., Executive Director  
Gloria Toney Brown, Administrative Officer  
Rosalind Spellman, Administrative Officer

**IN THE MATTER OF**  
**RONALD A. NARAIN, LCADC**  
**Respondent**

**License Number: LCA398**

**\* BEFORE THE MARYLAND**  
**\* STATE BOARD OF PROFESSIONAL**  
**\* COUNSELORS AND THERAPISTS**  
**\* Case Number: 2015-064**

\* \* \* \* \*

**CONSENT ORDER**

On March 30, 2017, the Maryland Board of Social Professional Counselors and Therapists ("the Board") issued a "Notice of Charges under the Maryland Professional Counselors and Therapists Act" (the "Charges") to **RONALD A. NARAIN, LCADC (the "Respondent") license number LCA398**, based on alleged violations of the Maryland Professional Counselors and Therapist Act ("the Act"), Md. Code Ann., Health Occ. II ("Health Occ. II") §§ 17-101 *et seq.* (2014 Repl. Vol. and 2016 Supp.).

Based upon the allegations made in the Complaint and the Board's investigation, the Board charged the Respondent under the following provisions Health Occ. II § 17-509:

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 . . . place any licensee . . . on probation, reprimand any licensee . . . , or suspend or revoke a license of any licensee . . . if the . . . licensee . . . :

- (4) Aids or abets an unauthorized individual in practicing clinical or nonclinical counseling or therapy or representing to be an alcohol and drug counselor, marriage and family therapist, professional counselor or professional art therapist;
- (8) Violates the code of ethics;
- (9) Knowing violates any provision of this title; [and]
- (13) Violates any rule or regulation adopted by the Board[.]

The pertinent provisions of the code of ethics and regulations adopted by the

Board provide:

**COMAR 10.58.03.04A.** A counselor shall: (7) Maintain accurate records; (8) Provide supervision to supervisees as required under COMAR 10.58.01, 10.58.07, and 10.58.08; [and]

**COMAR 10.58.03.04B.** A counselor may not: (2) Participate in dishonest, fraudulent, or deceitful activity in the capacity of a counselor.

On May 1, 2017, the Respondent appeared before members of the Board and the Board's counsel for a Case Resolution Conference (CRC) to discuss the potential resolution of the Charges by consent. At the conclusion of the CRC, the Respondent agreed to enter into this Consent Order to resolve the pending charges and to avoid the expense and time of proceeding to an administrative hearing. The Respondent and the Board agreed to the inclusion of Findings of Fact and Conclusions of Law as required by the Board, and with the terms and conditions set forth herein.

### **FINDINGS OF FACT**

The Board finds the following:

#### **I. BACKGROUND**

1. At all times relevant to these charges, the Respondent was and is licensed to practice clinical alcohol and drug counseling in the State of Maryland. The Respondent was originally licensed to practice in Maryland on or about August 26, 2003, under License Number LCA398. The Respondent's license is currently active and is scheduled to expire on January 31, 2019.

2. At all times relevant to these charges, the Respondent was employed as the senior program director at a substance abuse treatment program (the "Program") in

Baltimore, Maryland.<sup>1</sup> The Program also has locations in Delaware and Pennsylvania.

3. On September 19, 2015, the Board received a complaint from a former employee (the "Trainee") of the Respondent alleging that the Respondent allowed other employees, who were not Board-approved, to supervise the Trainee.

4. Thereafter, the Board initiated an investigation.

## **II. BOARD INVESTIGATION**

5. On March 29, 2016, the Board notified the Respondent of the Trainee's complaint and requested a written response. The Respondent provided a written response on April 8, 2016. The Respondent did not respond to the specific allegations in the complaint.

6. According to the complaint, the Trainee began working for the Program as an intern trainee in September 2013. The Trainee received his trainee letter on October 31, 2013 and the clinical manager ("Supervisor A") was listed as the Trainee's supervisor. Supervisor A, who was a Certified Associate Alcohol and Drug Counselor, was not a Board-approved supervisor.

7. The Trainee continued to work as an intern until Program A hired him as a full-time employee with trainee status on November 4, 2013.

8. Upon becoming a full-time employee, the Trainee transitioned to a different department at the Program. Supervisor A was no longer the Trainee's supervisor; however, according to the Trainee, the Respondent stated that Supervisor A's name could remain on the Trainee's trainee letter.

9. In furtherance of its investigation, the Board issued a subpoena, dated

---

<sup>1</sup> The names of individuals, hospitals or healthcare facilities involved in this case are confidential and not disclosed in this document. The Respondent may obtain the identities of these individuals and entities by contacting the administrative prosecutor.



April 14, 2016, to the Respondent for all supervision and employment records with respect to the Trainee.<sup>2</sup> On May 31, 2016, the Board received the Trainee's personnel and supervision records.

10. A review of the Trainee's supervision records revealed that between November 2013 and May 2015, the Trainee's supervision session records were signed by the Respondent and/or another employee ("Employee A") who was not a Board-approved supervisor at that time.<sup>3</sup> At the time, Employee A was a Certified Associate Alcohol and Drug Counselor.

11. In addition, on May 6, 2015, the Respondent signed the majority of the Trainee's supervision session notes dated January 29, 2014 through May 6, 2015.

12. Supervisor A did not sign any of the Trainee's supervision session records, as he was transferred in March 2013.

13. A review of the Trainee's personnel file revealed that the Respondent and another individual ("Employee B") signed as the Trainee's supervisor on other important personnel documents. Employee B, a Certified Supervised Alcohol and Drug Counselor, was not a Board-approved supervisor.

14. On August 9, 2016, a Board investigator interviewed the Respondent, who stated that Supervisor A was transferred and a new clinical supervisor was not hired, causing a staffing shortage.

15. The Respondent further admitted that he knowingly allowed Supervisor A, Employee A and Employee B to supervise the Trainee without Board approval.

16. The Respondent also admitted that he did not have the time to adequately

---

<sup>2</sup> Further communication with the Respondent resulted in the Board re-directing the subpoena to the Program's Human Resources Manager, which ultimately provided the requested records.

<sup>3</sup> Employee A became a Board-approved supervisor on June 28, 2016.

maintain the Trainee's supervision notes.

17. The Respondent stated that he oversaw the Program in its entirety and supervised both Employee A and Employee B, who were "helping him out" due to the staffing shortage.

18. The Respondent maintained that the Trainee was never unsupervised because the Respondent oversaw the Program and taught the Trainee. However, the Respondent admitted that he should not have allowed individuals who were not Board-approved to supervise the Respondent.

#### **CONCLUSIONS OF LAW**

Based on the foregoing Findings of Fact, the Board concluded that, if proven true, the factual allegations would support a finding as a matter of law that the Respondent violated Health Occ. II §§ 17-509(8), (9), and (13), as well as COMAR 10.58.03.04A(7) and 10.58.03.04B(2). The Board dismisses the charge under Health Occ. II § 17-509(4).

#### **ORDER**

Based on the foregoing Findings of Fact and Conclusions of Law, and the agreed upon terms of the resolution of the Charges by consent at the CRC, on this 12<sup>th</sup> day of May, 2017, by a majority of the full authorized membership of the Board considering this case, it is hereby

**ORDERED** that the Respondent's Maryland license shall be placed on **PROBATION** for a period of at least **ONE (1) year**, subject to the following terms and conditions:

1. During the probationary period, the Respondent shall enroll in and complete a Board-approved ethics course. The Respondent shall be solely

responsible for furnishing the Board with adequate written verification that he has completed the above-referenced course according to the terms set forth herein. The Respondent may not use any continuing education credits earned through taking such coursework to fulfill any continuing education requirements that are mandated for licensure renewal in this State;

2. The Respondent shall provide a copy of the Consent Order to his supervisor within **five (5) days** of commencing employment as a professional counselor. The Respondent shall cause his supervisor to submit written documentation to the Board that s/he has been provided a copy of the Consent Order. If the Respondent changes employment during the probationary period, he shall provide a copy of the Consent Order within **five (5) days** of commencing any employment;

3. After a minimum of one (1) year from the effective date of this Consent Order, the Respondent may submit a written petition to the Board requesting termination of probation. After consideration of the petition, the probation may be terminated, through an order of the Board or designated Board committee. The Board, or designated Board committee, will grant the termination if the Respondent has fully and satisfactorily complied with all of the probationary terms and conditions, including the expiration of the one (1) year probationary period, and there are no pending complaints related to the charges; and it is further

**ORDERED** that the Respondent shall practice as a professional counselor according to the Maryland Professional Counselors and Therapists Act and in


accordance with all applicable laws, statutes and regulations pertaining to the practice of professional counseling; 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 a show cause hearing before the Board, may impose any sanction which the Board may have imposed in this case, including a probationary term and conditions of probation, reprimand, suspension, lifting the stay of suspension, revocation and/or a monetary penalty; and it is further

**ORDERED** that the Respondent is solely 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. Code Ann., Gen. Prov. §§ 4-101 *et seq.* (2014 Repl. Vol. and 2016 Supp.), and is reportable to any entity to which the Board is obligated to report.

5-12-2017  
Date

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

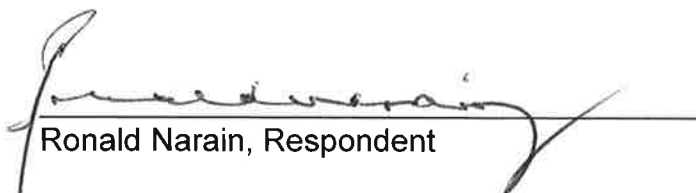
**CONSENT**

I, Ronald Narain, chose not to consult with counsel before signing this document. By this Consent, I accept to be bound by this Consent Order and its conditions and restrictions. I waive any rights I may have had to contest the Findings of Fact and Conclusions of Law.

I acknowledge the validity of this Consent Order as if entered into after the conclusion of a formal evidentiary hearing in which I would have had 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 acknowledge the legal authority and the jurisdiction of the Board to initiate these proceedings and to issue and enforce this Consent Order. I also affirm that I waive my right to appeal any adverse ruling of the Board that might have followed any such hearing.

I sign this Consent Order after choosing not to consult with counsel, without reservation, and I fully understand and comprehend the language, meaning and terms of this Consent Order. I voluntarily sign this Order, and understand its meaning and effect.

5/3/2017  
Date

  
Ronald Narain, Respondent

2017 MAY 3 PM 2 15

2017 MAY 3

NOTARY

STATE OF MARYLAND

CITY/COUNTY OF Baltimore :

I HEREBY CERTIFY that on this 3 day of May, 2017,  
before me, a Notary Public of the foregoing State personally appeared Ronald Narain  
and made oath in due form of law that signing the foregoing Consent Order was his  
voluntary act and deed, and the statements made herein are true and correct.

AS WITNESSETH my hand and notarial seal.

  
\_\_\_\_\_  
Notary Public

*My Commission Expires: May 3, 2018*

