



STATE OF ARIZONA  
BOARD OF BEHAVIORAL HEALTH EXAMINERS  
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DOUGLAS A. DUCEY  
Governor

TOBI ZAVALA  
Executive Director

August 23, 2022

Ms. Claudia R. Welborn

Dear Ms. Welborn:

On August 19, 2022, the Arizona Board of Behavioral Health Examiners ("Board") reviewed your application for licensure as a licensed clinical social worker and determined that you are not eligible for licensure pursuant to A.R.S. § 32-3275(A)(6). Specifically, the Board found that you engaged in conduct that had you been licensed would have constituted grounds for disciplinary action. The Board determined that the disciplinary action invoked the following violations that were based upon the conduct referenced thereafter:

1. A.R.S. § 32-3251(16)(v), engaging in any sexual conduct between a licensee and a client or former client.

These violations were based on the following findings:

1. On 04/07/22, Applicant submitted her LCSW application by Endorsement.
2. Applicant answered yes to two of the background questions within the questionnaire regarding previous complaints or actions against a professional license or certificate.
3. Applicant provided a 04/01/22 letter with the following explanation:
  - a. In 12/08, Applicant began working at a VA Medical Center.
  - b. In 01/09, Applicant was co-facilitating groups and s client ("Client") was assigned to Applicant's co-worker and Applicant was not his therapist.
  - c. After Client completed residential treatment, he was hired at the VA an employee and asked Applicant out on a date.
  - d. Applicant checked the NASW Code of Ethics and asked co-workers about this issue and Applicant married Client a short time later.
  - e. Applicant believed that since Client was not her current client, it did not constitute a violation of her code of ethics.
  - f. As Applicant progressed in her career she realized that although she did not provide direct care to Client, she still violated ethical boundaries and self-reported this ethical violation to Wyoming.
  - g. Wyoming found Applicant guilty of ethical violations since she had a dual relationship with Client which included a sexual relationship.

- h. In 11/18, Applicant was denied a license in Colorado due to the Wyoming disciplinary action.
4. In a 06/20/22 email to Board staff, Applicant represented that Client was not her direct client but rather a client of a group she co-facilitated.
5. An 11/28/18 NPDB report from Colorado indicated a denial of license due to sexual misconduct with a Wyoming client.
6. A 06/04/13 settlement agreement with Wyoming included the following in part:
  - a. From 08/08 – 01/10, Applicant was employed with the VA and from 01/09 – 04/09, Client was engaging in residential and outpatient services with the VA.
  - b. Applicant co-facilitated and authored group counseling notes for 43 group sessions and two additional outpatient sessions for Client.
  - c. Two months after providing direct behavioral health services to Client, Applicant married Client despite being a former client.
  - d. Over two years after marrying Client, Applicant then self-reported this prohibited relationship with Client to Wyoming.
  - e. Applicant was found in violation of Wyoming rules regarding ethical standards and romantic and sexual intimacies with a client or former client.
  - f. Applicant was also found in violation of the NASW Code of Ethics section 1.09 Sexual Relationships which prohibits sexual contact with former clients due to the potential harm to the client.
7. Applicant engaged in a sexually inappropriate relationship with a former client two months after services terminated and eventually married this former client.
8. Applicant appears to minimize her inappropriate sexual relationship by representing she was not Client's direct therapist but rather co-facilitated groups.
9. Applicant in fact provided direct behavioral health services to Client in a group setting with another group facilitator.
10. Applicant represents she reviewed the NASW Code of Ethics and consulted with other colleagues before marrying Client.
11. The NASW Code of Ethics clearly outlines that social workers should not engage in sexual activities or sexual contact with former clients because of the potential for harm to the client.
12. Applicant engaged in a sexual relationship with a former client, violating ethical boundaries.

Notice of Appealable Agency Action:

Pursuant to A.R.S. § 41.1092.03 (B), you may request a formal hearing by notifying the Board, in writing, within 35 days from the date of this letter. The hearing will be held within 60 days after the Board receives your request. (A.R.S. § 41-1092.05)(A)) At the hearing, you will have the burden of proof to demonstrate that you are qualified for licensure regarding the matters set forth above. The Office of the Attorney General will represent the State of Arizona at the hearing. In addition, if you request a hearing, you have the right to request a settlement conference. (A.R.S. § 41-1092.06) Please note that if you do not request a hearing by the close of business on **September 27, 2022**, your file will be closed without recourse to appeal. If you desire licensure in the future you will be required to submit a new application and fee. Please be further advised that pursuant to the Board's licensure statutes only persons holding licenses to

practice behavioral health may do so unless they are exempt from licensure pursuant to A.R.S. § 32-3271.

Notice to Licensure Applicant:

Pursuant to A.R.S. § 41-1093.01, an agency shall limit all occupational regulations to regulations that are demonstrated to be necessary to specifically fulfill a public health, safety or welfare concern. Pursuant to A.R.S. § 41-1093.02 and A.R.S. § 41-1093.03, you have the right to petition this agency to repeal or modify the occupational regulation or bring an action in a court of general jurisdiction to challenge the occupational regulation and to ensure compliance with A.R.S. § 41-1093.01.

If you have any questions, I can be reached at (602) 542-1617.

Sincerely,



Tobi Zavala  
Executive Director