

September 2026 Ethical Navigation: Who's the Counselor (an homage to Dolly Parton)

[The Potomac and Chesapeake Association for College Admission Counseling \(PCACAC\) Admission Practices Committee](#) is proud to present *Ethical Navigations (EN)*, an educational effort to explore issues that might face professionals involved in the college admissions process.

Each month, *Ethical Navigations* explores a hypothetical scenario and potential avenues to approaching the situation using [NACAC's Guide to Ethical Practice in College Admission](#) (GEPCA) as the lens. This guide is built on the *principles* of honesty, transparency, equity, and respect for students and fellow professionals while including the *core values* of education, access and equity, professionalism, collegiality, collaboration, trust, and social responsibility.

This Month's Scenario:

Dolly is a senior at Wildflower High School, and Joshua Applejack is her school counselor. Joshua has worked with Dolly throughout high school and knows Dolly's transcript, her family situation, and all about the C she earned in AP Chemistry.

But Dolly's parents hired Jolene Harper, founder of an Independent Educational Consultant (IEC) practice called Silver and Gold Educational Consulting, to help her with essay brainstorming, list-building, and staying organized with her college applications. Jolene is good at her job and deeply invested in her clients.

When it came time to fill out the Common Application, Dolly, a bit tired and overwhelmed, followed what she thought was Jolene's instructions to "*just put me down as your advisor so I can help you track everything*" and entered Jolene's name and email in the Common App's counselor field, instead of Joshua's. Dolly didn't understand that that field determines who the university treats as the student's official school counselor of record.

Fast forward to late fall and Joshua is reviewing grades when he realizes that Dolly had moved into a different science class than was listed on her transcript sent to colleges. Knowing that changes to a student's classes require notification to every college on Dolly's list, Joshua reaches out to the admission office at Clear Blue Morning University, Dolly's top choice, to send the updated transcript and explain the context.

The admission counselor at Clear Blue Morning University, Emmylou Sparrow, checks her system and sees Jolene Harper as the "counselor of record". Per Clear Blue Morning University's policy, Emmylou tells Joshua that she can't discuss a specific applicant's file with someone who isn't listed as the counselor.

The Conundrum:

Emmylou Sparrow is caught in a bind. She knows Jolene Harper, and she's not sure an IEC is the right person to be speaking with. Joshua is locked out of a conversation that he's ethically and professionally obligated to have, Jolene has no authority to submit or transmit updated transcripts, and Dolly is stuck in the middle, unaware that anything is even wrong.

Can Emmy turn to NACAC's [Guide to Ethical Practice in College Admission](#) (GEPCA) for advice?

Possible Approach:

Article 1: The Ethical Core of College Admissions, Section A Truthfulness and Transparency: Guiding Principles and Rationale says, "*Secondary schools should provide accurate, legible, and comprehensive transcripts and other school documents for all candidates for admission or*

scholarships.” GEPCA is explicit that secondary schools should carry the responsibility for providing accurate, legible, and comprehensive transcripts and other documents for every student.

More specifically, 1 B 1 b i) encourages that members should, *“To provide college admission counseling in the best interest of students, members should educate students and their families of their ethical responsibilities in the admissions process, including counseling families that it is unethical to submit false, plagiarized or fraudulent statements in the application process.”* In addition, according to Article 1 B 1. q), which was added to the August 2026, *“Secondary schools should encourage student to self-report any changes in enrollment status, any course work taken at other schools, any predicted or updated grades and/or test scores, and any disciplinary actions if required during their application process.”* Thus, while the obligation to send the updated transcript belongs to Wildflower High School as an institution, Josh could also expand the idea of self-reporting changes to a college and advise Dolly to correct the information listed on the Common Application’s counselor form field.

Another consideration is confidentiality. GEPCA asks members to send and receive information about students in confidence and to protect that information’s confidentiality. Emmylou’s instinct to be cautious about who she shares Dolly’s information with is prudent, but caution about who she’s sharing with isn’t the same as refusing legitimate, necessary information from the student’s school. GEPCA’s confidentiality principle exists to protect students, not to build a wall between a school counselor and a university.

GEPCA is also helpful in defining the players. Secondary school counselors and independent educational consultants are grouped together as “counselors”, but also separately defines independent consultants as professionals who work on a fee-for-service basis providing services to students and families in the admissions process, not to schools, and not as certifying offices for a school’s records. Jolene can legitimately be Dolly’s advocate, sounding board, and strategist, but she cannot be Wildflower High School.

Finally, GEPCA, emphasizes collegiality and collaboration. Members should work together to advocate for students and their best interests; trust between professionals is something all players are responsible for building and protecting.

Fixing this situation can come from different directions:

- Joshua could go ahead and send Dolly’s updated transcript to Wildflower University through the school’s official channel (Secondary School Report portal such as Naviance or Scoir) and identify himself as Wildflower High School’s counselor of record.
- Joshua could also talk to Dolly and encourage her to clarify the information to the colleges to which she has already applied by e-mail. He could then also encourage her to update the Common Application for future submissions. For support in this process, Joshua could refer to the student’s Affirmation Statements which include, *“I agree to notify the institutions to which I am applying immediately should there be any change to the information requested in this application.”* Dolly would have agreed to these affirmations when she submitted the Common Application.
- And Jolene, as an IEC that adheres to the IECA Principles of Good Practice, recognizes that her role isn’t the school counselor, should encourage Dolly to contact the schools to which she applied and let them know that Joshua is her school counselor.

Once Emmylou understands that Jolene was inadvertently identified as Dolly's counselor, and verifies that Joshua is truly her school counselor, she can speak with him directly. The tools we use to manage the admission process were built for efficiency. The advice provided by GEPCA in terms of confidentiality, communication, and collaboration can help us to make decisions in the student's best interests.

If you have any questions feedback, or proposals for future Ethical Navigations, please contact info@pcacac.org.

Do you have a question about NACAC's recommended ethical practices or a suggested revision to the [Guide to Ethical Practice in College Admission](#)? Please submit via [this form](#) and a member of the national AP committee will follow up with you.