

1 **BEFORE THE ARIZONA STATE BOARD OF BEHAVIORAL HEALTH EXAMINERS**

2 **IN THE MATTER OF:**

3 **BRYCE A. PARADIS, LAC-19675**  
4 **License Associate Counselor**  
5 **in the State of Arizona,**

6 **Respondent.**

**Case No. 2021-0158**

**CEASE AND DESIST ORDER**

7 The above-captioned matter came before the Arizona State Board of Behavioral Health  
8 Examiners (“Board”) on August 13, 2021, for the purposes of determining whether grounds  
9 existed to issue a Cease and Desist Order to Bryce A. Paradis (“Respondent”). Respondent was  
10 properly noticed of the Board’s review of this issue, and appeared.

11 **FACTS REVIEWED**

12 1. Respondent is the holder of license no. LAC-19675 for the practice of counseling  
13 in the State of Arizona.

14 2. In 02/21, Respondent was issued his LAC license with the Board with an effective  
15 date of 02/01/21.

16 3. On 04/16/21, Board staff received an application requesting approval to provide  
17 behavioral health services as a lower-level licensee in a private practice he owned (“Private  
18 Practice”), along with a proposed independent level licensee to provide Respondent with direct  
19 supervision.

20 4. The application raised concerns that Respondent may have been actively  
21 providing psychotherapy services at Private Practice prior to receiving Board approval.

22 5. Board staff subpoenaed Respondent’s Private Practice clinical records from his  
23 electronic health records (EHR) provider, which showed that between 01/21 – 05/21, Respondent  
24 provided psychotherapy services as a lower-level licensee in a private practice setting without  
25 Board approval, as well as providing psychotherapy services prior to licensure.

26 ...

1           6.       Despite Respondent’s assertions to Board staff on 04/22/21 that he would stop  
2 providing psychotherapy services at Private Practice without Board approval, Board staff’s  
3 investigation revealed the following:

- 4                   a. Subpoenaed EHR documents indicate Respondent continued providing  
5 psychotherapy services at Private Practice until at least 05/21.
- 6                   b. During a 07/07/21 investigative interview, Respondent admitted to Board staff  
7 that his EHR documents from 06/01/21 to the present would include progress  
8 notes and billing records that indicate he continues to provide psychotherapy  
9 services.
- 10                  c. As of 08/12/21, Respondent’s Private Practice website contained the  
11 following:
- 12                   • A list of a “Fee structure for psychological services” underneath the  
13 services Respondent provides.
  - 14                   • “Online counseling” though a HIPAA compliant platform.
  - 15                   • A patient portal link to Respondent’s EHR provider that allows for the  
16 scheduling of appointments that include, “psychotherapy, family  
17 psychotherapy, couples psychotherapy, and intake psychiatric diagnostic  
18 evaluation.”

19           7.       At the conclusion of the Board’s 08/13/21 review, the Board found that  
20 Respondent violated:

- 21                   a. A.R.S. § 32-3251(16)(l), engaging in any conduct, practice or condition that  
22 impairs the ability of the licensee to safely and competently practice the  
23 licensee’s profession.
- 24                   b. A.R.S. § 32-3251(16)(b), using fraud or deceit in connection with rendering  
25 services as a licensee or in establishing qualifications pursuant to this chapter.

26 ...

- 1 c. A.R.S. § 32-3251(16)(m), engaging or offering to engage as a licensee in  
2 activities that are not congruent with the licensee’s professional education,  
3 training or experience.
- 4 d. A.R.S. § 32-3251(16)(c)(ii), making any oral or written misrepresentation of a  
5 fact in any statements provided during an investigation or disciplinary  
6 proceeding by the board.
- 7 e. A.R.S. § 32-3251(16)(ii), violating any federal or state law, rule or regulation  
8 applicable to the practice of behavioral health, as it relates to:
- 9 • A.A.C. R4-6-210. Practice Limitations
  - 10 • A.A.C. R4-6-211. Direct Supervision: Supervised Work  
11 Experience: General
- 12 f. A.R.S. § 32-3251(16)(o), failing to furnish information within a specified time  
13 to the board or its investigators or representatives if legally requested by the  
14 board.
- 15 g. A.R.S. § 32-3251(16)(k), engaging in any conduct or practice that is contrary  
16 to recognized standards of ethics in the behavioral health profession or that  
17 constitutes a danger to the health, welfare or safety of a client, as it relates to  
18 the ACA Code of Ethics:

19 **C.4.a., Accurate Representation:**

20 Counselors claim or imply only professional qualifications  
21 actually completed and correct any known misrepresentations  
22 of their qualifications by others. Counselors truthfully  
23 represent the qualifications of their professional colleagues.  
24 Counselors clearly distinguish between paid and volunteer  
25 work experience and accurately describe their continuing  
26 education and specialized training.

1 h. A.R.S. § 32-3251(16)(q), failing or refusing to maintain adequate records of  
2 behavioral health services provided to a client.

3 8. The Board unanimously voted to offer Respondent a Consent Agreement for the  
4 voluntary surrender of his license.

5 **VIOLATION**

6 1. The services Respondent continues to advertise on his website and continues to  
7 provide according to his electronic health records system, while in independent practice without  
8 direct supervision, constitute the unauthorized practice of behavioral health as defined at A.A.C.  
9 R4-6-210 and A.A.C. R4-6-211.

10 **ORDER**

11 1. Under authority set forth in A.R.S. § 32-3284(A), the Board orders Respondent to  
12 immediately **Cease and Desist** from providing behavioral health services, as defined in A.R.S. §  
13 32-3251 *et seq.*, while in independent practice without direct supervision until such time as the  
14 Board authorizes Respondent to do so.

15 **RIGHT TO PETITION FOR REHEARING OR REVIEW**

16 Pursuant to A.R.S. § 41-1092.03 and § 32-3284(A), Respondent has the right to  
17 obtain an administrative hearing in this matter by submitting a written request to the Board. The  
18 Board must receive the request at its office within thirty (30) days after service of this Order.  
19 A.R.S. § 41-1092.03(B). Service of this order is effective five (5) days after date of mailing. The  
20 request must contain a concise statement of the reasons for the hearing. If Respondent requests a  
21 hearing, pursuant to A.R.S. § 41-1092.06, Respondent has the additional right to request that the  
22 Board conduct an informal settlement conference. To request an informal settlement conference,  
23 Respondent must submit a written request to the Board no later than 20 days before the hearing  
24 that may be scheduled in this matter. If a motion for rehearing is not filed, the Board's Order  
25 becomes effective thirty-five (35) days after it is mailed to Respondent.

26 ...

1 Respondent is further notified that the filing of a motion for rehearing is required to  
2 preserve any rights of appeal to the Superior Court.

3 Dated this 20<sup>th</sup> day of August, 2021

4 

5 \_\_\_\_\_  
6 Tobi Zavala  
7 Executive Director, Arizona State Board of  
8 Behavioral Health Examiners

8 **ORIGINAL** filed this  
9 20<sup>th</sup> day of August, 2021, with

10 Arizona State Board of Behavioral Health Examiners  
11 1740 W. Adams Street, Suite 3600  
12 Phoenix, Arizona 85007

11 **COPY** of the foregoing mailed by certified mail  
12 No. 9489 0090 0027 6139 7433 57 this  
13 20<sup>th</sup> day of August, 2021 to:

14 Bryce A. Paradis  
15 Address of Record  
16 Respondent

15 **COPY** of the foregoing mailed this  
16 20<sup>th</sup> day of August, 2021 to:

17 Mona Baskin  
18 Assistant Attorney General  
19 2005 North Central Avenue  
20 Phoenix, AZ 85004

19 **COPY** of the foregoing emailed this  
20 20<sup>th</sup> day of August, 2021 to:

21 

22 **COPY** of the foregoing emailed this  
23 20<sup>th</sup> day of August, 2021 to:

24 

1 **BEFORE THE ARIZONA BOARD**  
2 **OF BEHAVIORAL HEALTH EXAMINERS**

3 **In the Matter of:**

4 **Bryce A. Paradis, LAC-19675,**  
5 **Licensed Associate Counselor,**  
6 **In the State of Arizona.**

7 **RESPONDENT**

**CASE NO. 2021-0158**  
**CONSENT AGREEMENT**  
**FOR VOLUNTARY SURRENDER**

8 In the interest of a prompt and speedy settlement of the above captioned matter,  
9 consistent with the public interest, statutory requirements and responsibilities of the Arizona  
10 State Board of Behavioral Health Examiners ("Board"), and pursuant to A.R.S. §§ 32-3281(F)  
11 and 41-1092.07(F)(5), Bryce A. Paradis ("Respondent") and the Board enter into this Consent  
12 Agreement, Findings of Fact, Conclusions of Law and Order ("Consent Agreement") as a final  
13 disposition of this matter.

14 **RECITALS**

15 Respondent understands and agrees that:

16 1. Any record prepared in this matter, all investigative materials prepared or  
17 received by the Board concerning the allegations, and all related materials and exhibits may be  
18 retained in the Board's file pertaining to this matter.

19 2. Respondent has the right to a formal administrative hearing at which Respondent  
20 can present evidence and cross examine the State's witnesses. Respondent hereby irrevocably  
21 waives their right to such formal hearing concerning these allegations and irrevocably waives  
22 their right to any rehearing or judicial review relating to the allegations contained in this Consent  
23 Agreement.

24 3. Respondent has the right to consult with an attorney prior to entering into this  
25 Consent Agreement.

1           4.     Respondent acknowledges and agrees that upon signing this Consent  
2 Agreement and returning it to the Board's Executive Director, Respondent may not revoke their  
3 acceptance of this Consent Agreement or make any modifications to it. Any modification of this  
4 original document is ineffective and void unless mutually approved by the parties in writing.

5           5.     The findings contained in the Findings of Fact portion of this Consent Agreement  
6 are conclusive evidence of the facts stated herein between only Respondent and the Board for  
7 the final disposition of this matter and may be used for purposes of determining sanctions in any  
8 future disciplinary matter.

9           6.     This Consent Agreement is subject to the Board's approval, and will be effective  
10 only when the Board accepts it. In the event the Board in its discretion does not approve this  
11 Consent Agreement, this Consent Agreement is withdrawn and shall be of no evidentiary value,  
12 nor shall it be relied upon or introduced in any disciplinary action by any party hereto, except  
13 that Respondent agrees that should the Board reject this Consent Agreement and this case  
14 proceeds to hearing, Respondent shall assert no claim that the Board was prejudiced by its  
15 review and discussion of this document or of any records relating thereto.

16          7.     Respondent acknowledges and agrees that the acceptance of this Consent  
17 Agreement is solely to settle this Board matter and does not preclude the Board from instituting  
18 other proceedings as may be appropriate now or in the future. Furthermore, and  
19 notwithstanding any language in this Consent Agreement, this Consent Agreement does not  
20 preclude in any way any other state agency or officer or political subdivision of this state from  
21 instituting proceedings, investigating claims, or taking legal action as may be appropriate now or  
22 in the future relating to this matter or other matters concerning Respondent, including but not  
23 limited to violations of Arizona's Consumer Fraud Act. Respondent acknowledges that, other  
24 than with respect to the Board, this Consent Agreement makes no representations, implied or

25 ...

1 otherwise, about the views or intended actions of any other state agency or officer or political  
2 subdivision of the state relating to this matter or other matters concerning Respondent.

3 8. Respondent understands that once the Board approves and signs this Consent  
4 Agreement, it is a public record that may be publicly disseminated as a formal action of the  
5 Board, and that it shall be reported as required by law to the National Practitioner Data Bank.

6 The Board issues the following Findings of Fact, Conclusions of Law and Order:

7 **FINDINGS OF FACT**

8 1. Respondent is the holder of License No. LAC-19675 for the practice of  
9 counseling in the State of Arizona.

10 2. In 02/21, Respondent was issued his LAC license with the Board with an  
11 effective date of 02/01/21, but not notified of his license approval until 02/16/21.

12 3. On 04/16/21, Board staff received an application requesting approval to provide  
13 behavioral health services as an associate level licensee in a private practice he owned  
14 (“Supervised Private Practice”), along with a proposed independent level licensee (“Supervisor”)  
15 to provide Respondent with direct supervision.

16 4. As part of Respondent’s 04/16/21 application, Respondent signed, initialed and  
17 dated the following attestations:

18 a. “Misrepresentation by a supervisor, applicant or licensee may constitute  
19 unprofessional conduct.”

20 b. “Practice by a master’s level non-independent licensee operating or  
21 managing their own entity with immediate responsibility for the behavioral  
22 health services provided by the licensee may not commence until receiving  
23 the approval of the proposed supervisor and agreement between the  
24 supervisor and supervisee.”

25 ...



1           5.     The application raised concerns that Respondent may have been actively  
2 providing psychotherapy services as a lower-level licensee in a private practice he owned  
3 (“Private Practice”) prior to receiving Board approval.

4           6.     Board staff conducted research and found Respondent was actively advertising  
5 numerous types of psychotherapy services through Private Practice on various internet and  
6 social media platforms.

7           7.     On 04/22/21, Board staff had a telephone conversation with Respondent that  
8 included the following:

- 9           a.     Respondent was providing psychotherapy, coaching, and mentoring  
10                services through Private Practice.
- 11           b.     Since 02/01/21, Respondent has seen 2-3 psychotherapy clients at  
12                Private Practice.
- 13           c.     Respondent did not begin providing psychotherapy until his LAC was  
14                approved by the Board.
- 15           d.     Respondent admitted he made a mistake by seeing psychotherapy  
16                clients prior to being approved for Supervised Private Practice.
- 17           e.     Respondent advised Board staff that he would stop providing  
18                psychotherapy services now that he was made aware.

19           8.     Board staff subpoenaed Respondent’s clinical records from his electronic health  
20 record (“EHR”) provider, which revealed the following:

- 21           a.     Respondent provided psychotherapy services to at least 17 clients  
22                from 01/21 – 05/21.
- 23           b.     16 clients signed informed consent documentation that included an  
24                “**Informed Consent for Psychotherapy**” form.

25 ...

- 1 c. At least 12 client records had progress notes indicating
- 2 psychotherapy services were provided.
- 3 d. At least 12 clients had billing records indicating psychotherapy
- 4 services were provided.
- 5 e. At least 9 clients had clinical records indicating psychotherapy
- 6 services were provided before Respondent was effectively issued his
- 7 LAC license on 02/01/21.
- 8 f. At least 8 clients had clinical records indicating psychotherapy
- 9 services were provided after his LAC license was effectively issued
- 10 on 02/01/21, but before Respondent became aware of the issuance
- 11 on 02/16/21.
- 12 g. At least 8 clients had clinical records indicating psychotherapy
- 13 services were provided without Respondent having been approved
- 14 for Supervised Private Practice.
- 15 h. There are at least 15 progress notes that include “LAC” underneath
- 16 Respondent’s signature prior to the issuance of his license or before
- 17 he became aware of the issuance.
- 18 i. On at least 4 psychotherapy informed consent documents,
- 19 Respondent includes “License Pending” before he was licensed.

20 9. The EHR records reveal Respondent made the following misrepresentations  
21 during his 4/22/21 conversation with Board staff:

- 22 a. Respondent’s representation that he provided psychotherapy services
- 23 to 2-3 clients.
- 24 b. Respondent’s representation that he began providing psychotherapy
- 25 services on 02/01/21 after his license was issued.

1 c. Despite Respondent's assertion that he would stop providing  
2 psychotherapy services, he continued providing psychotherapy  
3 services on at least 9 occasions according to the summarized client  
4 files.

5 d. Additionally, it appears Respondent attempted to conceal that he  
6 continued providing psychotherapy services by not completing  
7 progress notes, despite billing for these psychotherapy services.

8 10. Respondent initially represented the following during his 07/07/21 investigative  
9 interview with Board staff:

10 a. Whatever records the Board has are probably correct.

11 b. Respondent denied providing psychotherapy services prior to 01/21.

12 c. Although the records use the term psychotherapy, the records from  
13 the EHR were actually coaching services.

14 d. Respondent did not become aware of Supervised Private Practice  
15 until after he found Supervisor.

16 e. **NOTE:** All new licensees, including Respondent, are mailed a  
17 document with their approval letter that includes the following:

- 18 • "As an associate level licensee, you are required to practice  
19 under direct supervision pursuant to A.A.C. R4-6-211."

20 11. Respondent ultimately made the following admissions and statements during his  
21 investigative interview:

22 a. Respondent acknowledged seeing clients through Private Practice  
23 without a supervisor in place and admits it was not appropriate.

24 b. Respondent admitted he provided psychotherapy services prior to  
25 being licensed by the Board on 02/01/21.

1 c. Respondent created a “pending” LAC license in the EHR as a way to  
2 circumvent Board procedures and processes because he needed an  
3 income and a way to provide for his family.

4 d. Respondent admitted providing services outside of his scope.

5 12. Despite advising Board staff that he would stop providing psychotherapy services  
6 at Private Practice during their 04/22/21 conversation, Respondent admitted that his EHR  
7 documents from 06/01/21 to the present would include progress notes and billing records that  
8 indicate psychotherapy services.

9 13. Respondent represented the following regarding his current and past client  
10 records:

11 a. Respondent was not aware if he was able to change his EHR to  
12 indicate coaching, rather than psychotherapy.

13 b. The content of the notes would show coaching services even though  
14 the progress notes and billing records would indicate psychotherapy.

15 c. Respondent still advertises for psychotherapy through social media to  
16 this day in order to keep his “brand” out there.

17 14. Additionally, Respondent’s 04/16/21 application included a clinical supervision  
18 agreement between Respondent and Supervisor with an effective date of 04/01/21.

19 15. The alleged 04/01/21 clinical supervision agreement is directly contradicted by  
20 the clinical supervision agreement provided by Supervisor, which has an effective date of  
21 02/03/21.

22 16. While the 02/03/21 agreement is signed and dated by both Respondent and  
23 Supervisor, the 04/01/21 agreement is only signed by Respondent, with the 04/01/21 date  
24 appearing to be altered.

25 17. Respondent represented the following to Board staff:

- a. Respondent does not know why the form he submitted to the Board was not signed by Supervisor.
- b. Respondent denied altering the date of the form he submitted in any way or altering the original supervision contract in any way.
- c. Respondent has no idea why he would submit a supervision contract dated 04/01/21 when the supervision actually began in 02/21.
- d. Respondent acknowledged that it looks like he attempted to circumvent the Board and its processes and procedures.
- e. Respondent acknowledged that providing a supervision contract dated for 04/01/21 was not being transparent with the Board.
- f. Respondent now understands his lack of respect for the Board's process.

18. During the 04/22/21 phone conversation with Respondent, Board staff notified him they would be sending subpoenas as part of Board staff's investigation.

19. Subsequently, Board staff emailed Respondent two separate legally binding subpoenas with due dates of 04/23/21 and 04/30/21.

20. In a 04/23/21 email to respondent with a subpoena attached, Board staff also included a series of questions within the email requesting a written response from Respondent.

21. Respondent failed to respond to both subpoenas and the questions despite numerous efforts to follow up with Respondent via emails and phone calls / voice messages.

22. On 05/18/21, Board staff mailed the notice of complaint to 3 addresses for Respondent via regular and certified mail and also emailed Respondent the notice of complaint to 2 separate email addresses.

23. 06/22/21 was the due date for Respondent's written response to the Board complaint, which Respondent failed to provide.

1           24.    On 06/25/21, Board staff issued a subpoena to appear in person for an  
2 investigative interview, which was issued via regular and certified mail and email.

3           25.    Despite not responding to any of Board staff's subpoenas or communications,  
4 Respondent did comply with the subpoena to appear for the investigative interview.

5           26.    On 07/07/21, Respondent represented the following during the investigative  
6 interview:

7                   a. Respondent acknowledged receiving all 3 subpoenas and indicated it  
8                   was an error to disregard the subpoenas.

9                   b. Respondent has a "grudge" with the Board for making him take more  
10                   classes to obtain his LAC.

11                   c. Respondent admitted it was "probably" intentional to not respond to  
12                   the subpoenas.

13                   d. Respondent is fully aware the subpoenas sent to him were legally  
14                   binding documents.

15           27.    Respondent acknowledged to Board staff that the following advertisements /  
16 postings regarding his experience and scope were misleading, incorrect, and "probably"  
17 advertised in order to make his credentials look better:

18                   a. Over 6 years of experience with Private Practice.

19                   b. Psychotherapist since 04/16.

20                   c. In Practice for 12 years.

21                   d. Advertising psychotherapy services prior to issuance of his LAC licensee.

22           28.    From 01/07/21 – 05/21/21, various clinical records establish Respondent  
23 provided psychotherapy services to numerous clients both before and after being issued his  
24 LAC license.

25 ...



1 A.A.C. R4-6-211. Direct Supervision: Supervised Work Experience:

2 General

3 7. The conduct and circumstances described in the Findings of Fact constitute a  
4 violation of A.R.S. § 32-3251(16)(o), failing to furnish information within a specified time to the  
5 board or its investigators or representatives if legally requested by the board.

6 8. The conduct and circumstances described in the Findings of Fact constitute a  
7 violation of A.R.S. § 32-3251(16)(k), engaging in any conduct or practice that is contrary to  
8 recognized standards of ethics in the behavioral health profession or that constitutes a danger  
9 to the health, welfare or safety of a client, as it relates to the ACA Code of Ethics:

10 **C.4.a., Accurate Representation:**

11 Counselors claim or imply only professional qualifications actually  
12 completed and correct any known misrepresentations of their  
13 qualifications by others. Counselors truthfully represent the  
14 qualifications of their professional colleagues. Counselors clearly  
15 distinguish between paid and volunteer work experience and  
16 accurately describe their continuing education and specialized  
17 training.

18 9. The conduct and circumstances described in the Findings of Fact constitute a  
19 violation of A.R.S. § 32-3251(16)(q), failing or refusing to maintain adequate records of  
20 behavioral health services provided to a client.

21 **ORDER**

22 Based upon the foregoing Findings of Fact and Conclusion of Law, the parties agree to  
23 the provision and penalties imposed as follows:

24 1. Respondent's license, LAC-19675, shall be surrendered to the Board, effective  
25 from the date of entry as signed below.



1           2.       The surrender shall be considered a revocation of Respondent's license.

2  
3                   **PROFESSIONAL ACCEPTS, SIGNS AND DATES THIS CONSENT AGREEMENT**

4           *Bryce Paradis*

5           Bryce Paradis (Aug 20, 2021 14:30 PDT)

6           Bryce A. Paradis

7                                   Aug 20, 2021

8                                   Date

9                   **BOARD ACCEPTS, SIGNS AND DATES THIS CONSENT AGREEMENT**

10           By:

11                   *M. Zavala*

12                   TOBI ZAVALA, Executive Director  
13                   Arizona Board of Behavioral Health Examiners

14                                   Aug 20, 2021

15                                   Date

16           **ORIGINAL** of the foregoing filed Aug 20, 2021  
17           with:

18           Arizona Board of Behavioral Health Examiners  
19           1740 West Adams Street, Suite 3600  
20           Phoenix, AZ 85007

21           **EXECUTED COPY** of the foregoing sent electronically Aug 20, 2021  
22           to:

23           Mona Baskin  
24           Assistant Attorney General  
25           2005 North Central Avenue  
26           Phoenix, AZ 85004

27           Bryce A. Paradis  
28           Address of Record  
29           Respondent