

IF HE DOES NOT LISTEN:
Escalating Biblical Counseling to Church Discipline
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INTRODUCTION

Church discipline has largely departed from the modern American Protestant church. In a 2017 Lifeway Research study surveying 1,000 evangelical pastors from a variety of denominations, 55% of respondents indicated that “a member has not been formally disciplined since I came as pastor nor prior as far as I know.”² These trends are not particularly new; in 1983, Jay Adams lamented in an address that “Church discipline among American congregations almost does not exist.”³ Detractors from church discipline, whether actively attacking the practice or silently failing to practice it, question its value in the church today, its alignment with the various structures and methods of church growth, and its consistency with the mercy which is to be offered in Christ.⁴ Yet, these detractors miss out on the clearest reason for its application: “Jesus commanded it.”⁵

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² “Churches Rarely Reprimand Members, New Survey Shows,” *LifeWay Research* (blog), April 5, 2018, <https://lifewayresearch.com/2018/04/05/churches-rarely-reprimand-members-new-survey-shows/>. An additional 21% responded that it had been three or more years since the last case of discipline had happened.

³ Jay E Adams, “Discipling, Counseling and Church Discipline,” *Journal of Pastoral Practice* 7, no. 3 (1984): 15. The address here described was delivered to the National Association of Nouthetic Counselors (now the Association of Certified Biblical Counselors).

⁴ John S. Hammett and Benjamin L. Merkle, eds., *Those Who Must Give an Account: A Study of Church Membership and Church Discipline* (B&H Academic, 2012), chap. 6.

⁵ Hammett and Merkle, chap. 6. Adams: “All the reservations, objections, and hesitations that people have about discipline are irrelevant. Jesus does not leave the matter up to us; He tells us what to do.” Jay E. Adams, *Handbook of Church Discipline: A Right and Privilege of Every Church Member* (Zondervan, 2016), 48. Emphasis original.

Jay Adams identified an unshakable connection between biblical counseling and the renewed practice of church discipline: “Counseling and church discipline are inextricably intertwined; neither can be carried on effectively and biblically without the other.”⁶ Adams noted elsewhere that where one found church discipline, he was likely to find someone in the church participating in the revival of biblical counseling.⁷ Yet, pursuing church discipline correctly requires a right understanding of the people and situations wherein discipline should take place. This essay will argue that biblical counselors have a duty to escalate counseling cases through the process of church discipline. This duty is limited first by salvation/membership status of the counselee (the subject of counseling) and second, the details of the sin being counseled (the counseling situation). Furthermore, fulfilling this duty will also necessarily involve breaching strict confidentiality as the process of discipline is pursued.

In brief, the subjects of counseling who can be disciplined include members of local churches and must exclude non-members and unbelievers who cannot be the subjects of discipline, though they may both experience benefits from counseling and evangelism. The situations in which counseling will lead to discipline involve a church member in clear, ongoing, unrepentant sin and who refuses to engage in ongoing counseling care and correction. And finally, while Scripture does give direction regarding the concept of limited knowledge of transgressions, Scripture’s concept of confidentiality is substantially different than that of current professional and legal definitions, allowing for increased awareness of sin among others as necessary. To argue for these points, the paper will begin with a step-wise understanding of church discipline, followed by advancing the three points above, and will conclude with an illustrative case study.

A brief study of nomenclature will be helpful here before proceeding. In modern writing, the term church discipline is frequently used to describe the final step of the process of restorative and purgative discipline described by Jesus in Matthew 18:15-18.⁸ In this step, the unrepentant brother has

⁶ Adams, *Handbook of Church Discipline*, 11.

⁷ Adams, “Discipling, Counseling and Church Discipline,” 15–16.

⁸ As will be discussed later in the paper, this is not nearly a full description of the full process in view in Matthew 18:15-18 which includes a number of confrontations which may or may not end in repentance and restoration. Jay Adams’s *Handbook of Church Discipline* is an extremely

his sin presented before the congregation and upon final unrepentance is declared a “gentile and tax collector.”⁹ What makes this particular usage helpful, especially in cases of data gathering such as the Lifeway study above, is that the final phase is the only phase of the process which can be realistically measured. Records can be kept of church decisions to exclude someone from membership, and those records can clearly chart the progress of the practice.¹⁰ What makes this use of nomenclature unhelpful is that it ignores the fuller picture offered by Matthew 18.

A STEP-WISE UNDERSTANDING OF CHURCH DISCIPLINE

A biblical understanding of church discipline demands a broader definition than the one currently used or measured. It demands a definition which includes the various elements listed in Matthew 18:15-18:

If your brother sins against you, go and tell him his fault, between you and him alone. If he listens to you, you have gained your brother. But if he does not listen, take one or two others along with you, that every charge may be established by the evidence of two or three witnesses. If he refuses to listen to them, tell it to the church. And if he refuses to listen even to the church, let him be to you as a Gentile and a tax collector. Truly, I say to you, whatever you bind on earth shall be bound in heaven, and whatever you loose on earth shall be loosed in heaven.¹¹

helpful resource for laying out the various elements of this process. Adams, *Handbook of Church Discipline*. In this case, the common use of church discipline would only refer to step 5 of 5 in Adams’s paradigm.

⁹ Matthew 18:18. All Scripture quoted in the English Standard Version unless otherwise noted.

¹⁰ Gregory Wills, who wrote the historical chapter for the Hammett and Merkle book quoted above, also wrote an excellent book on this specific topic, tracking the use and eventual disuse of various modes of discipline in Baptists in the American south from the early-nineteenth through early-twentieth centuries. Gregory A. Wills, *Democratic Religion: Freedom, Authority, and Church Discipline in the Baptist South 1785-1900* (New York; Oxford: Oxford University Press, USA, 2003).

¹¹ 1 Corinthians 5 also describes an aspect of church discipline where flagrant, well-known sin is moved immediately from awareness to expulsive discipline. This is an important aspect of discipline, but not one under review here as there is no particular room in this instance for a counselor to be involved in the process before the declaration of expulsion. This is not to say that a faithful counselor would or could not be involved after the declaration is made and in an effort to see restoration occur in the offender.

In the first confrontation, the one sinned against is tasked with addressing the sin and exposing it “for what it is.”¹² The call here is for repentance.¹³ Upon repentance, the process is complete, and full and total restoration can be expected. But if repentance is not secured or the offender refuses to hear from the offended, a further group of witnesses is included.¹⁴ While these witnesses may have visually witnessed the original offense, it is neither implied nor necessary that such be the case.¹⁵ The standing of these witnesses within

¹² Adams divides this passage and the process it creates into five steps: “1) Self-Discipline, 2) One-on-One, 3) One or Two Others, 4) The Church, 5) The World.” Adams, *Handbook of Church Discipline*, 30. In his chapter on “Self-Discipline,” Adams helpfully delineates a precursor to the more formal considerations of church discipline — self-discipline. In this step, the believer is conscious of his own sin and actively working to repent from it. This action taken on the part of the believer prevents the process from moving into the confrontation necessary in the remainder of the process. Self-discipline also carries throughout the process as the repentant believer must exercise such discipline over themselves even as they are confronted from the outside about their sin. Ted Kitchens also helpfully notes at this point: “Jesus desired self-discipline from His followers (Matt. 5:22-23; Mark 7:14-23), but when self-discipline fails, then the Christian community is responsible to exercise discipline lovingly.” Ted G Kitchens, “Perimeters of Corrective Church Discipline,” *Bibliotheca Sacra* 148, no. 590 (April 1991): 212. Hammett and Merkle, *Those Who Must Give an Account*, chap. 5.

¹³ Repentance as a biblical notion consists of a turning of heart from sin to Christ which leads to a changed life. See Matthew 11:28-29, Luke 24:46-47, Acts 2:37-38, 3:19, 17:30, 20:21, Romans 2:4, 2 Corinthians 7:10, Hebrews 6:1. Repentance is not complete and final upon the first turning but must persist through ongoing life and striving. In this way, the confronted believer is called to forsake his sin and, with the encouragement and care of the body of Christ (e.g. Heb. 3:13), make efforts to mortify it (put it to death – Romans 8:13). See treatments such as *Spurgeon’s Catechism*, Q. 70, John Owen’s three treatises on sin, helpfully collected in Kelly M. Kapic and Justin Taylor, *Overcoming Sin and Temptation*, Redesign edition (Wheaton, IL: Crossway, 2015). Additional Puritan works such as Thomas Watson, *Doctrine of Repentance* (Edinburgh; Carlisle, PA: Banner of Truth, 1988); Thomas Boston, *True Repentance: The Necessity of Repentance*, vol. VI, *The Whole Works of the Late Reverend Thomas Boston of Etrick* (GLH Publishing, 2015); “A Discourse of Mortification by Stephen Charnock,” accessed November 16, 2019, https://www.the-highway.com/mortification_Charnock.html. As well as modern works: Wayne Grudem, *Systematic Theology: An Introduction to Biblical Doctrine* (Zondervan Academic, 2009), chap. 35; Jay E. Adams, *How to Help People Change: The Four-Step Biblical Process*, The Jay Adams Library (Grand Rapids, MI: Ministry Resources Library, 1986); Kris Lundgaard, *The Enemy Within: Straight Talk About the Power and Defeat of Sin* (P&R Publishing, 1998).

¹⁴ The paper will further define this refusal, its extent and duration, as it addresses refusal within the counseling process below.

¹⁵ Hammett and Merkle, *Those Who Must Give an Account*, chap. 5. If visual witnesses to the offense the only proper subject of this phase, the number who could participate in such an activity would be greatly diminished and the spirit of this command would certainly preclude the later activity of sharing with the entire church. That said, these witnesses ought to have a positive standing in the church and be known for their sobriety and fairness. It could be said here that an understood element underlying Matthew’s text is that there is a possibility that the witnesses would deduce that the claim made by the offended was not valid on Scriptural

the body is also not defined. It would be reasonable to believe that a wise and sober-minded church member would be well-suited to this task, but it would also be reasonable at this point for the offended to request the aid of a pastor or lay counselor in the church.

Upon refusal of this second group, the matter is to be brought to the church.¹⁶ As the church body is informed, they are challenged to confront the offending member and call him to repentance. At his refusal of “even the church,” he is declared by the church body to no longer be considered a believer in Jesus Christ. The church members’ actions toward this newly removed person must indicate deep concern and care for the lostness of his soul and an earnest plea for true faith in Christ that causes one to flee from sin.

Having laid out a basic paradigm for church discipline, this essay will focus on the application of counseling which leads to church discipline by first addressing the proper subjects of discipline and then the situations which will require exercise of discipline.

ASSESSING THE SUBJECTS FOR COUNSELING THAT LEADS TO DISCIPLINE

Operating frequently within the church or lay counseling centers, biblical counselors frequently encounter a wide variety of counselees. One of the foundational churches in the biblical counseling movement, Faith Church in Lafayette, IN, has built its counseling ministry in large part as an outreach to its community.¹⁷ This is a blessed opportunity and one that Faith Church

grounds. This would terminate the process and could even result in a call to the offended to repent from such accusations which were unfounded.

¹⁶ Adams here proposes a cautionary note: “I think it goes without saying that to tell it to the church is not to be done by a brother standing up in the middle of a worship service and declaring what has happened.” Adams, *Handbook of Church Discipline*, 68. Such a practice would “violate the principles of good order set forth in 1 Corinthians 14.” This would then require one of two approaches: either the believer waits to share his concern until a gathering is called of only the members of the church (some churches have such gatherings as a monthly member’s meeting) or, alternatively, the offended can bring the concern to the elders of the church who would then be tasked with arranging such a time as the church can be so gathered.

¹⁷ Bob Kellemen and Paul Tripp, *Biblical Counseling and the Church: God’s Care Through God’s People*, ed. Kevin Carson (Zondervan, 2015), chap. 19.

has seen great success in over time. However, practicing in such a setting creates a question as to the proper subject of counseling which leads to church discipline. Faith Church, and any church with a counseling ministry open to the public, will encounter three categories of counsees: 1) unbelievers, 2) members of the counseling church, and 3) Christians who fellowship with other churches.¹⁸

Unbeliever

When considering the practice of church discipline, the first category of counselee, namely unbelievers, can be quickly excluded. The biblical counselor who engages with a professed unbeliever has no need to press toward a formal process of church discipline with one who has self-identified as apart from Christ and His church. The unbeliever has not willingly submitted himself to the life and authority of the church. Said another way, removal from church life can only return one to their un-churched state. The church has nothing to take from an unbeliever, rather it holds out the offer of the Gospel. Thus a biblical counselor may (must) certainly instruct and evangelize a self-professed unbeliever, but the matter of church discipline is settled from the start. Unbelievers cannot be church disciplined.¹⁹

Member

Contrary to the unbeliever, the second category of counselee, the duly engaged member of the church, demands a different response. Membership in the church is the basis of pursuing church discipline. It is the believer's voluntary association with this particular expression of the body of Christ that identifies him as a candidate for discipline. The biblical counselor, operating within the local church, is under obligation to fulfill the duties of discipline when necessary with a member of the church.

¹⁸ It may be necessary in practice to add a fourth category: professing Christians who regularly fellowship with the counselor's church but have yet to make the commitment to membership. The decision may need to be made in those cases to contact whatever church the professing Christian previously fellowshiped with or, lacking such, to consider them an unbeliever due to their failure to fellowship with a church. The counselor may in practice direct them to pursue membership as a function of his counseling.

¹⁹ Consent and disclosure will be discussed further later in the paper. Regardless of whether the counselee is a potential subject for discipline, the church's intake documents should make abundantly clear the circumstances under which confidentiality would be breached.

Believing Non-Member

The third category of counselee, believing non-member, provides more difficulty. In this category, the counselor is meeting with someone who is a professed believer, but not a member at the church overseeing the counseling.²⁰ Either this happens because a local church has an established counseling ministry and someone has come in from the outside, or this could happen in settings such as an independent counseling center that operates apart from a local church.²¹ In either case, where sin is involved and church discipline may need to be pursued, the counselor has an obligation to involve and address the counselee's home church.²² This is an act of covenant respect to the leaders of the home church, and such a policy should be clearly in place when counsees from other churches are received in a counseling ministry.²³

²⁰ Adams helpfully addresses several situations which may arise: The counselee may come from an unfaithful church, one which denies the Scriptures and the Gospel, in which case the counselor will intentionally engage the counselee on these specific points to either challenge their profession of faith or to encourage them to re-understand the status of their home "church." The other situation, where the counselee comes from a faithful church, requires caution to preempt the possibility of "sheep stealing." Adams offers the caution that the pastor of the home church should be consulted and his consent secured before counseling is undertaken. If the primary reason for the counselee pursuing care outside of the home church is the inexperience of the home church pastor in such matters, a relationship of training can be created and edified through the home church pastor participating in the counseling process. Jay E. Adams, *Shepherding God's Flock: A Handbook on Pastoral Ministry, Counseling and Leadership* (Grand Rapids, MI: Zondervan, 1986), 205–9.

²¹ Based on the transcendent commitment of believers to their local church, I would argue here that membership should be considered in-play even in a non-church counseling center. Therefore, a counseling center counselor would have the same obligations to pursue church discipline regardless of the setting of their counsel. If counselor A engages counselee B at a counseling center, he is still obligated to treat B as a fellow church member and pursue the simplest expression of the church discipline process outlined throughout this paper. The setting is not enough to warrant a shift in categories.

²² Robert Cheong discusses conflict among believers: "If you are not part of the same community, then each of you can either ask someone from your own community or approach a respected third party group whom you both trust and know will give wise counsel." Robert K. Cheong and Stephen Timmis, *God Redeeming His Bride* (Christian Focus Publications, 2013), chap. 8. Kindle Location 1849. While I would agree with his note here in reference to a general practice of believers addressing sin, the pseudo-authority invested in counselors would push me to ensure that the matter was brought directly to the pastoral leadership of the counselee's church.

²³ The analogy is crude, but this is the same respect that one parent would show while temporarily caring for another parent's child. The counselee's home church may even knowingly employ the wisdom of the other church's counselor, but this does not free the counselee from the home church's authority.

The biblical counselor must limit his attempts to escalate church discipline based on the membership status of the counselee.²⁴ By rightly limiting the pursuit of discipline to professing Christians, both the counselor and church are preserved from seeking to judge outsiders (1 Corinthians 5:12) and can focus their efforts on calling brothers back from sin and, when necessary, “purging the evil person from among you” (1 Corinthians 5:13).

ASSESSING THE SITUATIONS FOR COUNSELING THAT LEADS TO DISCIPLINE

What Sin is Worthy of Discipline

The aim of this paper is to identify and limit the subjects and situations a biblical counselor may encounter which would require escalating a counseling case to church discipline. As such the counselor would need to have some pre-existing understanding of which situations would require such escalation.²⁵ Ted Kitchens writes helpfully in *Perimeters of Corrective Church Discipline* that historically churches have sought to create sin-lists from various passages and outworkings of those passages of Scripture. Rather than attempt such an exhaustive list, Kitchens creates four categories of sin described in Scripture: 1) Private and personal offenses that violate Christian love, 2) divisiveness and factions that destroy Christian unity, 3) moral and ethical deviations

²⁴ This is both an argument from and an argument for meaningful church membership as promoted by 9Marks Ministries. The church who either entirely abdicates the charge to account for its sheep or is haphazard in its application of doing so sets believers up to fail in their fight against sin. Adams noted in his title that discipline is in fact a “right and privilege of every church member.” For additional resources on 9Marks’s presentations on church membership see Mark Dever, *The Church: The Gospel Made Visible* (B&H Academic, 2012); Mark Dever and Mark Dever, *Nine Marks of a Healthy Church.*, Revised and expanded edition. (Crossway Books, 2000); Jonathan Leeman, *Church Discipline: How the Church Protects the Name of Jesus*, 1 edition (Crossway, 2012); Jonathan Leeman, *The Rule of Love: How the Local Church Should Reflect God’s Love and Authority*. (Crossway, 2018). As well as numerous articles and practical guides to membership and implementation at 9Marks.org.

²⁵ Biblical counselors encounter any number of issues in caring for church members and beyond: grief over loss, relationship struggles, career choices, doctrinal questions, identity issues, and many more. Certainly not all of these issues are directly connected to sinfulness on the part of the counselee and may simply be an expression of the care demonstrated in 1 Thessalonians 5:14: “...encourage the fainthearted, help the weak, be patient with them all.”

that break Christian standards, and 4) teaching false doctrine.²⁶ Kitchens's effort is to provide a comprehensive rubric for evaluating possible sin areas without attempting to create a list which can quickly lose applicability.²⁷ Kitchens collates the various declarations against sin in the New Testament under these headings and argues that any sin outwardly practiced is worthy of confrontation as commanded by Christ.²⁸ "The New Testament teaches that no sin is tolerable to those whom Christ has redeemed. No Christian should be allowed to embrace unrepented sin and move in and out of the church at will."²⁹ This is not to say that seemingly minor sins should be elevated to the rapid-response indicated in 1 Corinthians 5, but rather that a believer who holds onto sin, sin of any kind, and refuses to repent is liable for discipline.³⁰

In light of the above, biblical counselors who seek to evaluate a case for possible escalation should look for clear biblical sin. Kitchens's categories could be helpful, but consistency demands that the leadership of the church establish

²⁶ Kitchens, "Perimeters of Corrective Church Discipline," 211–12. The Puritan John Owen saw a similar categorization of issues in his chapter on Church Discipline. John Owen, *The True Nature of a Gospel Church and Its Government*, Chapter X, *On Excommunication*. in John Owen, *The Life and Works of John Owen*, ed. William Gould, n.d., vol. XVI, Pages 151-183. Stephen Yuille, surveying Owen, noted three categories: Moral, Doctrinal, and Behavioral. J Stephen Yuille, "John Owen and the Third Mark of the Church," *Puritan Reformed Journal* 2, no. 1 (January 2010): 217–18. Owen's chapter on excommunication (Church discipline) is cited above.

²⁷ As Kitchens notes, in the past, the church has sought to compile extensive lists containing every possible sin eligible for discipline. The Scripture contains lists of sin such as 1 Corinthians 6: 9-10, Galatians 5:19-21, and yet it also contains broad statements that could render any number of actions or attitudes as sinful (e.g. Romans 14:23b: "for whatever does not proceed from faith is sin"). Therefore lists that seek to encapsulate every possible mode of sin are on the whole unhelpful. Historically, the lists not only included the sins but also the required restitution. Greg Wills helpfully describes the historical progression of discipline beginning with the church fathers. The notion of certain sins requiring more substantial restoration is clearly seen in Gregory of Nyssa who prescribed 27 years of penitence "for intentional murder and robbery, 18 for adultery, and nine for fornication, grave robbing, and apostasy that was coerced." Hammett and Merkle, *Those Who Must Give an Account*, chaps. 5, Kindle Location 2769.

²⁸ Kitchens, "Perimeters of Corrective Church Discipline," 212–13.

²⁹ Kitchens, "Perimeters of Corrective Church Discipline," 213.

³⁰ Looking at John Owen's work in the 1600s offers a cautionary addendum to Kitchens's statement above. Owen cautions: "No excommunication is to be allowed in cases dubious and disputable, wherein right and wrong are not easily determinable unto all unprejudiced persons that know the will of God in such things; nor is it to be admitted when the matter of fact stands in need of testimony and is not proved by two witnesses at the least." John Owen, *The True Nature of a Gospel Church and Its Government*, Chapter X, *On Excommunication*. in Owen, *The Life and Works of John Owen*, vol. XVI, Pages 151-183.

a paradigm for the church as a whole. Which sin areas will be considered for discipline? What evidence and witnesses will be required for each? Without such clarity from church leadership, the biblical counselor is set adrift.

If He Does Not Listen

Having established the necessity of pursuing discipline in the case of church members and provided a set of considerations for which sins necessitate discipline, the paper will now examine evidence of refusal which may lead a counselor to escalate to formal church discipline.

Jay Adams laid out the foundational concept of biblical counseling: “Nouthetic confrontation, in its biblical usage, aims at straightening out the individual by changing his patterns of behavior to conform to biblical standards.”³¹ Adams’s vision of biblical counseling clearly had much to do with the confrontation of sin in the counselee.³² For the biblical counselor then, addressing sin is a normal and natural part of the counseling process. Counselees come to address private sin which has proved troublesome (e.g., a teen struggling with pornography who requests the help of his youth pastor). Counselees come upon the finding out of their secret sin (e.g., the same teen whose parents found out). Sometimes counselees come to address an issue of sin between them.³³ In this way, the counselor may find himself engaged in the process of Matthew 18 church discipline at a variety of points: He may be assisting a believer in self-discipline, he may be confronting sin as the first party of Matthew 18:15, or he may be brought along as one of the witnesses of the “one or two others” of verse 16.³⁴

While these different scenarios may create a different application of Scriptural truth, the necessity to observe the pattern of Matthew 18 remains.

³¹Jay E. Adams, *Competent to Counsel* (Grand Rapids, MI: Zondervan, 1986), 46.

³²Use of the word “sin” more than 400 times in *Competent to Counsel*, a book just over 260 pages, would indicate the same.

³³The current standard for material relating to peacemaking is Ken Sande, *The Peacemaker*, 3rd ed. (Ada, MI: Baker Books, 2004).

³⁴Adams’s understanding of “tell it to the church” begins with consulting the church elders who may then approach the accused before bringing it to the church. This could also be another point at which a counselor was employed (especially if the elders are well-versed in biblical care) to better address the sin area the accused is struggling with. Adams, *Handbook of Church Discipline*, 70.

The wise counselor then will look for the defining mark in a counselee which triggers escalation: “if he will not listen.” Assuming that the counselor is addressing a clear case of ongoing sin, readily described by a passage of Scripture or a widely accepted and reasonable application of a passage of Scripture, the counselor is mandated to escalate into the next phase of church discipline when the counselee refuses to listen.

One reasonable mark of refusal to listen would be the untimely termination of ongoing counseling by the counselee. A typical in-office biblical counselor will establish a course of care which may have a defined end date or specific markers of success which are set out early in the process.³⁵ The counselee will know he is under the care of the counselor, and the relationship will be defined as such. A self-professed believer, engaged in counseling, retains a measure of what might be called “listening-credibility” as long as he continues to meet with and engage the counselor.

Another possible element which could be brought to bear on the decision to escalate is the willingness of the counselee to complete the homework assigned by the counselor.³⁶ Adams argues for a temporary suspension of counseling in some cases where homework is not completed: “There may come a time when assignments are so often neglected, two, three, or four weeks in a row in spite of all attempts to understand why and to motivate the counselee, so that the counselor must dismiss the counselee until he is prepared to work.”³⁷ However, even the failure of the counselee to complete the work can be an informative aspect that assists the wise counselor in furthering his care. The counselor may find that the counselee has failed to understand the assignment – in which case training is in order, or they may have lost hope for change or succumbed to fear – in which case encouragement is needed.³⁸ If these hindrances and others

³⁵ One such model Robert Kellemen terms “Spiritual Treatment Planning.” Robert W. Kellemen and Brian Croft, *Gospel Conversations: How to Care Like Christ* (Grand Rapids, MI: Zondervan, 2015), 212ff.

³⁶ Homework has a long history in the biblical counseling movement. Adams promoted it in many of his works including several chapters in Jay E. Adams, *The Christian Counselor’s Manual: The Practice of Nouthetic Counseling* (Zondervan, 2010), chap. 27,28, and 29. Various writers have also produced manuals to provide homework related to specific issues common to biblical counselors such as Wayne A. Mack, *A Homework Manual for Biblical Living: Personal and Interpersonal Problems*, First edition (Phillipsburg, NJ: P&R Publishing, 1979).

³⁷ Adams, *The Christian Counselor’s Manual*, 314.

³⁸ *Ibid.*, 314–15.

such as practical concerns have been addressed, the counselor may need to consider if failure to comply with reasonable homework should be considered as evidence of a failure to listen, prompting escalation.

Failure to Listen vs. Failure to Repent

In the situations above, the counselee has effectively refused to listen to the counselor and therefore escalation is in order. Applied uncritically, a counselor could take the same approach to a counselee who receives counsel but still continues in sin. Such a counselor might assume that, once the convicting words regarding the sin have been spoken, any further falls into the same sin warrant escalation. However, in the counseling ministry, failure to repent may not necessarily equate to refusal to listen.

Some cautionary notes should be observed regarding an ongoing pattern of sin. Real striving, real progress, and intentionality should be present in the counselee, but to demand perfection, especially in areas of “pesky” sins, would seem to be beyond the realm of reasonable consideration for church discipline. Said another way, the counselor can look for direction rather than perfection. Matthew 18:15-18 directly precedes verses 21-22 where Peter asks just how many times the brother can sin and yet be forgiven. Jesus’s answer, whether translated 77 or 70 times 7, indicates an overabundance of forgiveness. One mark the wise counselor could look for is the eagerness and earnestness with which the counselee pursues restoration. Paul represents such eagerness in 2 Corinthians 7:10-11 as evidence of “godly grief.”³⁹ Thus the wise counselor will seek to guide and instruct the one who stumbles toward fuller and fuller repentance, understanding that frequent forgiveness will be necessary as a counselee grows in Christlikeness.

³⁹ “For godly grief produces a repentance that leads to salvation without regret, whereas worldly grief produces death. For see what earnestness this godly grief has produced in you, but also what eagerness to clear yourselves, what indignation, what fear, what longing, what zeal, what punishment! At every point you have proved yourselves innocent in the matter.” 2 Corinthians 7:10-11. I would argue here that while counselors cannot fully know the heart of the one confessing sin, this mark alone should carry much weight in helping the counselor determine the sincerity of the repentance being offered. That sincerity should be prioritized when considering escalation.

Patience in Escalation

One common thread throughout multiple authors addressing this topic is the necessity for patience to be carried out in the process of escalation. Each phase of the Matthew 18 process is to be given time and persistence. Adams writes humorously about an argument between brothers: “they are both huffing but one of them is puffing as well.”⁴⁰ When the offended brother returns to resolve the situation, he has resolved his huffing, but still perceives puffing on the part of the offender. Apparently neither huff nor puff are the proper settings for resolving conflict.

Robert Cheong helpfully presses towards such patience by laying the groundwork for a “redemptive plan” to be implemented in the rescue process.⁴¹ Such plans look for opportunities to share grace and celebrate those seeds of repentance which can be seen in the life of the straying believer. Perhaps the erring brother has yet to understand from Scripture where his sin is condemned. Perhaps, as is certainly increasingly common, he has been indoctrinated with a worldly diagnosis of mental illness which, in his mind, releases him from all sinful liability. Such things must be sought out and worked through before the process can reasonably move forward.

The wise counselor will seek to rightly limit and clarify the cases which are deemed worthy of escalation. These situations will be marked by clear, biblically documented sins, a refusal on the part of the counselee to listen, and a patient coming alongside by the counselor who looks for signs of repentance. Such a definition, adopted under the authority of the local church, will allow the counselor the freedom and confidence to address sin in a counselee with the full range of tools Christ intended.

CONFIDENTIALITY AND COUNSELING ESCALATION

Having discussed the marks of a case which warrants escalation, the paper now moves to a discussion of a necessary consequence of escalation: breach of confidentiality. One defining difference between the majority of practitioners

⁴⁰ Adams, “Discipling, Counseling and Church Discipline,” 22.

⁴¹ Cheong and Timmis, *God Redeeming His Bride*, chap. Chapter 9. Kindle Location 2020.

of biblical counseling and those who operate from an integrated approach in a licensed setting is the allegiance to professional codes established by secular organizations, such as the APA's code of ethics.⁴² Such codes may contain helpful applications of collected wisdom, and yet they cannot be utilized to undercut the authority of God's Word in the local church and the counseling task.

Writing in the *Journal of Pastoral Practice* (later the *Journal of Biblical Counseling*), Larry Spalink described a practice of strict confidentiality, rooted in Roman Catholic confessionals, dating back to Augustine.⁴³ This confidentiality, Spalink argues, was built on a common sense assumption: if the one who receives the confession ever shares the content of the confession, no one will make use of confession again. Thus, the possibility of a confession which would later be repeated renders unlikely, if not impossible, any future confessions. The confidentiality created by this set of assumptions could be termed absolute confidentiality, and its implementation would utterly bar a biblical counselor from participating in church discipline.⁴⁴

Proponents of the integration of Christianity and modern psychology such as Clyde Narramore were adamant about the value of confidentiality in counseling, even stating that confidentiality was “the first and most important element in professional ethics.”⁴⁵ This prizing of confidentiality can even extend to impeding the responsibility of the counselor in church discipline. Walter Becker, writing on the ethics of counselors in the church, advises against breaking confidentiality in the process of church discipline.⁴⁶ Thus

⁴² Available online at American Psychological Association, “Ethical Principles of Psychologists and Code of Conduct,” <https://www.apa.org>, June 1, 2003, <https://www.apa.org/ethics/code/>.

⁴³ Larry Spalink, “Confidentiality and Biblical Counseling: Warning: This Office Bugged By the Holy Spirit,” *Journal of Pastoral Practice* 3, no. 3 (1979): 57. Spalink notes that many U.S. states uphold such a protection against divulging confidential information revealed to a clergyman. *Ibid.*, 59.

⁴⁴ There is nuance between the practice of the Catholic priest and that put forward by the APA's ethics code. The Catholic priest is responsible to protect the “seal” of the confessional even if intent to commit crime is indicated. Counseling professionals are not even legally, better yet ethically, provided such all-encompassing restrictions. *Ibid.*, 58.

⁴⁵ Clyde M. Narramore, *The Psychology of Counseling ; Professional Techniques for Pastors, Teachers.* (Zondervan Pub. House, 1960), 24. Also cited in Spalink, “Confidentiality and Biblical Counseling: Warning: This Office Bugged By the Holy Spirit,” 56.

⁴⁶ Walter W Becker, “The Paraprofessional Counselor in the Church: Legal and Ethical Considerations,” *Journal of Psychology and Christianity* 6, no. 2 (1987): 78–82. Quoted in

for the integrated practitioner, professional ethics can supercede biblical responsibilities. This must not be so.

Writing about Christian (integrated) counseling ethics, Randolph Sanders offers a helpful and cautionary case in point.⁴⁷ In the scenario, the counselee Brad is engaged in an affair and comes reluctantly seeking counsel from a therapist upon the pleading of his son. At the second meeting, without any consultation with Brad, Brad's pastor has been invited to the session and all the details of the affair have been shared with him.⁴⁸ Brad is caught unaware and unprepared for what he has walked into. The counselor had not informed Brad before the counseling that such disclosure was possible, neither had the counselor informed Brad during the meeting that disclosure would be necessary to fulfill Christian duty. Was there clear sin? Certainly. Was patience applied? None. Was Brad listening to the counselor? He was not given a chance. The counselor, in seeking maybe even to apply Matthew 18, has actually shortcut the process and made things much more difficult for an already sin-stricken situation. This application of the process of discipline fails several of the tests already described in this paper. The counselor has failed to rightly apply the kind of confidentiality that Scripture prescribes.

Positively, Scripture does demand a level of confidentiality, though without using that term. Frequently throughout the Proverbs the gossip or whisperer is seen as negative character who causes all manner of troubles.⁴⁹ Biblical counselors must avoid the sin of gossip and maintain confidences with utmost care. Moreover, confining the number of those knowledgeable about the situation is built into Matthew 18. At the beginning of the process only the offender and offended are aware of the offense. The presence of such an escalating number of those made aware clearly indicates that apart from escalation the number would remain small.

Randolph K. Sanders, *Christian Counseling Ethics: A Handbook for Psychologists, Therapists and Pastors*, vol. Second edition, Christian Association for Psychological Studies Books (Downers Grove, IL: IVP Academic, 2013), 383–84.

⁴⁷ Sanders, *Christian Counseling Ethics: A Handbook for Psychologists, Therapists and Pastors*, Second edition: 34–36.

⁴⁸ Ibid.

⁴⁹ Proverbs 16:28, 18:8, 26:20, 26:22

So, biblical counselors can affirm an overall pattern of “counseling confidences” as Adams calls them.⁵⁰ It is also reasonable to argue that the counselor should explain the confidences which will be kept and which might need to be broken in certain cases. The counselor would do well to clearly articulate these in an intake document which would be explained clearly before the first session of care. Preserving confidence and informing counselees is the pattern put forth by the standards of conduct of organizations such as ACBC.⁵¹

Though Scripture does indeed limit the sharing of information, when it comes to addressing sin, Scripture also demands an increasingly expanded circle of knowledge. The biblical counselor cannot hide behind professional standards of confidentiality when biblical fidelity is at stake. On the one hand, the Bible clearly requires submission to governmental authorities (Romans 13), many of which have clear requirements for the reporting of abuse, especially in the case of minors. On the other hand, the authority of Christ, mediated through the local church demands following through with the requirements of “reporting” for the purpose of escalating the counseling conversation towards formal church discipline.

CASE STUDY

Steve and Susan had recently become more active in the ministries of the church.⁵² Not long after this newfound interest in ministry, church leadership was made aware that Steve had approached two female church members with inappropriate comments and sexually suggestive remarks. Church leadership received their concerns and responded immediately, sensitively investigating the claims and considering what additional resources were needed: counsel for the members who came forward, contacting law enforcement etc.⁵³ Steve

⁵⁰ Adams, *Shepherding God's Flock*, 83. Quoted also in Spalink, “Confidentiality and Biblical Counseling: Warning: This Office Bugged By the Holy Spirit.”

⁵¹ “Standards of Conduct,” *Association of Certified Biblical Counselors* (blog), accessed July 30, 2020, <https://biblicalcounseling.com/certification/standards-of-conduct/>.

⁵² Names and situation modified to preserve confidentiality.

⁵³ Measures were put in place by the leadership to immediately bar Steve from any church activities for the safety of the women who had accused Steve. These measures were not taken as a declaration of Steve's status in the faith or an indication that Steve could not return at a future

was contacted and asked to provide an explanation; he obliged. He assured the leadership that these were the only two women whom he had spoken to in this way, and that he was miserably sorry for the way he had acted.

Steve began meeting with the church's biblical counselor. Steve was cooperative with the counselor and met multiple times a week to engage in the process. However, as the counseling went on over a period of weeks, more victims came forward. From the initial counseling sessions, Steve was given frequent opportunities to name any other victims, and, yet, he continued to hide the truth. The counselor and church leadership pleaded with Steve to confess his sin fully rather than continuing to be outed as new victims came forward. He would not. Seeing Steve's continued resistance, church leadership made the decision to pursue formal church discipline, escalating the situation from the counseling room to the full meeting of the church membership.

CONCLUSION

Steve was the right subject for counseling which led to discipline. Steve's ongoing membership at the counselor's local church put him directly in the authority sphere of the church. He was in the right situation for counseling to escalate to discipline. Steve's repeated attempts to evade his counselor's questions and hide his sin demonstrated not only a refusal to repent but a refusal to engage in meaningful change. And while the information surrounding his situation was handled as discretely as possible throughout the counseling process, the scriptural mandate for pursuing church discipline eventually called for Steve's sin to be described to the church body.

This paper has sought to rightly limit counseling which escalates to church discipline by identifying the proper subjects and situations. The wise counselor, and the wise church who engages in intentional counseling ministry, will engage this topic thoroughly and clearly both to ensure biblical discipline is taking place and to limit the excesses of discipline practiced without discernment. The counseling task is one of restoration and care

point, but rather to create an opportunity for understanding the situation and protection for those who had made the accusations.

and though often viewed negatively and judgmentally, so too is the task of church discipline. The wise counselor will apply God's standards above man's standards and provide church members with the full measure of privilege which is theirs in Christ – including the privilege of church discipline rightly applied.