Introduction

In his landmark work, Competent to Counsel (copyright 1970), Jay E. Adams challenged the dependence of contemporary Christian counseling on clinical psychology and psychiatry with their secular assumptions. He argued that counseling is fundamentally the work of the Holy Spirit Who uses the Bible, sacraments, prayer and the fellowship of God’s people to affect personality and behavioral change. It follows that only Christian believers, and specifically pastors who are equipped to teach God’s Word, are “competent to counsel.” This book set the stage for what Adams perceived to be a counseling revolution to which he gave the name “nouthetic counseling,” a term which will be more fully explained later.

Competent to Counsel rapidly became a best-seller and was translated into several languages. It was followed by a number of other works and gave rise to what came to be known as the nouthetic counseling movement. The Christian Counseling and Education Foundation (CCEF) had already been established in suburban Philadelphia in 1968, two years before the publication of Competent to Counsel. It was followed in 1976 by the National Association of Nouthetic Counselors (NANC), with headquarters in Lafayette, Indiana. The former serves as a counseling and training centre, in association with neighbouring Westminster Theological Seminary (where Adams was teaching at the time); the latter accredits counselors, counseling centres and counseling training centres.

This article will attempt to outline some principal views of the movement thus begun, take note of some criticisms from within as well as outside of the movement, and show how at least some present-day leaders have developed what they prefer to call by the more generic term of biblical counseling.
Some Foundational Views of Nouthetic Counseling

A: The Sufficiency of Scripture

A central biblical passage in Adams’ overall approach is 2 Timothy 3: 14-17. An entire book, *How to Help People Change,* is devoted to this text and it occurs frequently in Adams’ other writings. *The Christian Counselor’s Manual* notes that the passage contains four steps which “set forth plainly the four basic activities involved in biblical counseling.” There is a *judging activity* based on biblical standards; a *convicting activity* by the convicting ministry of the Holy Spirit (John 16: 8); a *changing activity* and a *structuring activity,* providing the godly discipline necessary for effective change and growth. In *A Theology of Christian Counseling,* Adams says that “according to this passage the Word was designed to transform behavior.” This transformation has two phases: an *instantaneous one* in which a sinner is regenerated and justified, and a *gradual one* in which the process of sanctification takes place.

It is an implication of nouthetic counseling that an unbeliever cannot be counseled in the proper sense of the term, since counseling by definition involves the process of sanctification. Thus, an unbeliever should be evangelized first. Only if and when he responds positively to the gospel can he be counseled according to biblical principles on the assumption that the sanctifying work of the Holy Spirit has begun.

1 Corinthians 10: 13, which reads in part “no test has overtaken you, but such as is common to man,” is taken by Adams as a proof of the sufficiency of Scripture for counseling:

If no Christian faces unique tests in life, and if Paul can say to the church at Corinth (living in an entirely different age and culture) that what happened to the Israelites is pertinent also to them (cf. vss. 6, 11), a counselor may be assured that he will face no truly unique problems in counseling. There are just so many basic common themes of sin and no more.

The biblical counseling so described contrasts with “the counsel of the ungodly” as described in Psalm 1:

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Both the counsel and those who give it are ungodly. It is ungodly (1) because it competes with and tries to overthrow God’s counsel, (2) because it is inspired by Satan and (3) because (intentionally or otherwise) it is given by those who rebelliously side with the devil. Over against such counsel (and in direct opposition to it) the psalm places God’s Word (vs. 2).  

**B: The Definition of Biblical Counseling**

The sufficiency of Scripture for counseling implies the sufficiency of Adams’ definition of biblical counseling by the term “nouthetic.” Based on the Greek *nouthesis* and its cognates, as used in such passages as Acts 20: 31, Romans 15: 14, Colossians 1: 28 and 3: 16, nouthetic counseling consists of at least three basic elements.

First, the word is frequently used in conjunction with *didasko* (to teach), but whereas *didasko* simply suggests the communication of information, *nouthesis* presupposes the need for change:

the idea of something wrong, some sin, some obstruction, some problem, some difficulty, some need that has to be acknowledged and dealt with, is central. In short, nouthetic confrontation arises out of a condition in the counselee that God wants changed. The fundamental purpose of nouthetic confrontation is to *effect personality and behavioral change.*

The second element in the concept of nouthetic counseling is that problems are solved by verbal means. Trench is quoted as saying:

It is training by word – by the word of encouragement, when this is sufficient, but also by that of remonstrance, of reproof, of blame, where these may be required; as set over against the training by act and by discipline which is *paideia*...The distinctive feature of *nouthesia* is the training by word of mouth.

The third element in *nouthesis*:

has in view the purpose or motive behind nouthetic activity. The thought is always that the verbal correction is intended to benefit

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8 Ibid.
the counselee. This beneficent motive never seems to be lost, and is often quite prominent. . . 9

Adams rejects the idea that “confrontation” has a negative implication. “Nothing could be further from my mind as I use it.” The word implies authority, but not belligerence. It might have been as well to speak of “nouthetic consultation” except that:

Consultation . . . is too neutral. The positive aggressiveness and willingness to put one’s self on the line in reaching out to help another in a face to face encounter that is inherent in nouthesia is better expressed by the word confrontation. For me it is a good and more positive term than consultation. 10

C: Relationship to Psychology and Psychiatry

Adams claims that he is open to the insights of psychology to the extent that they support and “fill out” the basic commitment of nouthetic counseling. He frequently expresses frustration at the perception that he is anti-psychology. 11

Adams’ relationship to psychology and psychiatry is clarified in his inaugural address as Professor of Practical Theology at Westminster Seminary in 1975. “Counseling and the Sovereignty of God” asserts that because God is sovereign over all of life and His Word applies to all of life and since God in His Word assigns to pastors the task of shepherding His sheep, the work of counseling necessarily falls to those (pastors) whom God in His sovereignty has so ordained. It is their task to help people learn to love God and their neighbors. Since all personal and interpersonal difficulties involve a violation of these two great commandments, it is the pastor’s responsibility to help persons relate to other persons and to God the Person. But when he attempts to do so, he finds other persons (psychologists and psychiatrists) competing with him. “I contend, therefore,” says Adams:

that it is not the pastor who is responsible for the overlap; it is the psychologist on the one side, who has moved his fence over on to the pastor’s territory, and the psychiatrist on the other, who has also encroached upon his property.

Unfortunately, until recently, pastors have been all too willing to allow others to cut their grass. 12

Does this mean that there is no legitimate role for psychologists and psychiatrists?

9 Ibid., 45-46.
11 See Ibid., 31.
12 Ibid., 18.
No, you misunderstand me. It is exactly not that. Remember, I said clearly that they live next door to the pastor. My problem with them is that they refuse to stay on their own property. I have been trying to get the pastor to mow his lawn to the very borders of his plot...13

After discussing the role and value of experimental psychology, Adams turns his attention to psychiatrists, noting that:

In the United States psychiatrists are physicians, who (for the most part) use their medical training to do little else than prescribe pills...

The pastor recognizes the effects of Adam’s sin upon the body; he, therefore, has no problem working side-by-side with a physician who treats the counselee’s body as he counsels him about its proper use. From the days of Paul and Luke, pastors have found kinship with medical personnel.

Why, then, does the psychiatrist present a problem? Certainly it is not because of his medical background. The problem is that he will not stay in his own backyard. He keeps setting up his lawn chairs and moving his picnic table onto the pastor’s property.14

Although Adams has little if any sympathy for psychiatry as currently practised, he does see experimental psychology as a useful source of scientific research, while rejecting the humanistic approach of most clinical psychology. Adams is highly critical of those who seek to integrate humanistic psychology with Scripture. He believes that “the study of psychology in depth coupled with a smattering of scriptural data can lead only to the grossest misstatements regarding man and the solutions to his problems.”15

D: Means and Methods of Behavioral Change

An early chapter in The Christian Counselor’s Manual establishes that “the Holy Spirit is the Principal Person” in the counseling procedure. As such He is not only to be distinguished from unclean spirits, but identified as the Source of all holiness. The “fruit” of the Spirit is the result of His work. “Christians may not counsel apart from the Holy Spirit and His Word without grievously sinning against Him and the counselee.”16 Adams stresses the Holy Spirit’s role in effecting attitudinal and behavioral change.

Counselors may take it for granted that any quality of life or attitude mandated in Scripture is possible and may be acquired through Christ by the

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13 Ibid.
14 Ibid., 18-19.
16 Ibid., 6-7.
work of His Spirit. While not all gifts of the Spirit may be acquired by all Christians, His fruit are available to every believer.

The way in which the Spirit effects biblical change is through the patterns of “Dehabituation and Rehabituation.” Not just behavioral changes, but a change in the “manner of life” (Ephes. 4: 22) is called for. Change is a two-fold process. It involves both putting off the old manner of life and putting on the new. Thus, it is not sufficient to stop telling lies; one must become a “truth teller” (v. 25). It is not enough to stop stealing; the thief must instead become a hard-working person who shares with others (v. 28). The works of the flesh must be replaced by the fruit of the Spirit (Gal. 5). The way of the ungodly must give way to the fruit of righteousness (Psalm 1). The disciple of Christ must die to self by taking up his cross (put off) and follow Jesus (put on). The Christian life begins by turning from idols to the living and true God. It continues as the believer habitually turns from sin to righteousness.

How does this happen? By the “practice of godliness” leading to “the life of godliness.” “If you practice what God tells you to do, the obedient life will become a part of you.” Habit is a part of life whether it is learning how to drive or putting toothpaste on a brush. But habits can be evil as when our hearts are “trained in greed” (2 Peter 2: 14). Thus, since God made us with the capacity for living according to habit, counselors must help counselees to develop godly habits and lifestyles.

All this talk of human effort must not be misunderstood. We are talking about “grace-motivated effort,” not the work of the flesh. It is not effort apart from the Holy Spirit that produces godliness. Rather, it is through the power of the Holy Spirit alone that one can endure. By his own effort, a man may persist in learning to skate, but he will not persist in the pursuit of godliness. A Christian does good works because the Spirit first works in him.

Whereas Satan prompts feeling-oriented living, the Holy Spirit prompts obedience toward God. How, then, is the counselee to be motivated to choose commandment-oriented living over feeling-oriented living? First, he must choose to become in practice what he already is in principle. He must consider himself to be “dead to sin but alive to God in Jesus Christ” (Rom. 6: 1). This involves the painful task of crucifying the flesh, taking it to the cross. It is hard as Paul’s struggle in Romans 7: 14-25 testifies, but victory is possible through Christ (v. 25). Then there is the motivation of reward and punishment. God himself motivates by rewards (1 Cor. 3: 8, 14; Ephes. 6: 2; Heb. 11: 6) and this together with Proverbs’ instructions on such matters as the beneficial use of the “rod” in discipline should alert us to this biblical principle. Other biblical motivations include the following:

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18 Ibid., 167 ff.
19 Ibid., 181.
20 Ibid., 182.
21 Ibid., 186.
“Submit yourselves for the Lord’s sake…” (1 Peter 2: 13)

“. . . for the sake of conscience toward God . . .” (1 Peter 2: 19)

“for the sake of righteousness . . .” (1 Peter 3: 14)

The choice of motive or motives to be used in any given case depends on the circumstances and individuals involved, with the provision that it/they be biblical and other-oriented rather than self-oriented.

The emphasis is on external behavior, the result rather than the process of the Holy Spirit’s work. This is illustrated in a number of ways. Those suffering from problems of fear, anger, anxiety and depression must simply come to terms with the relevant biblical directives and act on them. Husbands who find themselves incapable of loving their wives as Christ loved the church, or even as their neighbor, must learn to love them as their enemies. Those divorced on unbiblical grounds (i.e. other than adultery or desertion by an unbelieving spouse) must repent and seek reconciliation following the “reconciliation/discipline” dynamic of Matthew 18: 15-18. If need be, this can lead to the excommunication of the non-compliant spouse (and even of the church of which he/she is a member!), followed by the declaration that he/she is now an unbeliever and has abandoned his/her spouse, who is now free to remarry. Ex-homosexuals who have difficulty engaging in sexual relations with their spouses must realize that sexual relations within marriage are a duty and when they give themselves to their spouses in this way, their own sexual difficulties can be overcome.

Adams briefly discusses the fact that believers will persevere to the extent that they “abide” in Christ (cf. John 15: 5-6). Also, as we have seen, one of the motivations for change is coming to terms with who we are in Christ, seeing ourselves as God sees us, freed from the slavery of sin and risen to newness of life in Christ. Indeed, Adams might argue that his whole methodology arises out of the implications of union with Christ; but when he talks about stressing “the whole relationship to Christ,” he focuses almost entirely on the behavior that arises out of the believer’s relationship with Christ rather than on the relationship itself and the corresponding motivation that arises not out of duty but devotion, motivation from the love of Christ as well as fear of judgement (2 Cor. 5).

22 Ibid., 170.
24 Ibid., 204-205.
Some Criticisms of Nouthetic Counseling

A: The Sufficiency of Scripture

We have seen that nouthetic counseling’s most basic claim is that the Scriptures provide a sufficient basis for counseling. This claim has been controversial, even among critics most closely identified with Adams’ overall theological position.

For instance, a critique from the continental branch of Reformed orthodoxy comes in the form of a 1975 doctoral dissertation by J. S. Hielema, published in the Netherlands, in which he compares Adams with his Princeton contemporary Seward Hiltner. Regarding Adams, Hielema notes the influence of Reformed apologist Cornelius Van Til, as well as biblical theologian Geerhardus Vos. Adams’ dependence on covenant theology, particularly in his treatment of the family and of Christian education, is also stressed. Beyond this, however, Hielema questions Adams’ claim that “It is those views commonly held by Reformed theologians . . . that I have assumed throughout.”

Hielema was writing before the publication of A Theology of Christian Counseling, which does indeed cover the major loci of Reformed theology applied to counseling, but I suspect he would still want to ask, “Does an emphasis on ‘scriptural counseling . . . that is wholly scriptural’ really appreciate the nature and character of Reformed theology . . .?”

Hielema wonders if a counseling approach that stresses that the Bible and the Bible only can be the counselor’s textbook does not move in the direction of “the theology of Anabaptism” and “biblicism.” Does Adams, he asks, adequately appreciate that the “multiform wisdom” of Scripture – a phrase used by John Murray – implies (quoting John Frame) “that a study of nature and the human situation may be necessary in order to determine the proper application of a Scriptural command?”

Does nouthetic counseling “(u)se all the results of the sciences in its interpretation of the Christian Life – these results interpreted, of course, in the light of Scripture?” According to Hielema, “In Adams’ plea to use the Bible as a textbook for counseling we find a serious misunderstanding of the Holy Spirit’s work in both the history of Christianity (corpus christiani) and the life of the believer.”

Another critic, Larry Crabb, in discussing the view that the Bible directly answers every legitimate question about life and is therefore a sufficient guide for counseling, makes the point that one who takes this position must

27 Ibid., 224.
28 Ibid., 225.
29 Ibid., 223.
30 Ibid., 223-234.
necessarily limit the questions he asks to ones specifically answered in the Bible. “The effect of this viewpoint is to disregard important questions by calling them illegitimate.” This is because “it is possible to give the literal meaning of the text a comprehensive relevance that it simply does not have.”

Crabb argues for another way of seeing the sufficiency of Scripture – as a framework for thinking through every important question about people, drawing out the implications of biblical data and always remaining within the boundaries which Scripture imposes.

A related point, made by several critics, has to do with Adams’ perceived minimizing of natural revelation (e.g. psychology) in relation to special revelation (Scripture). This comes in various forms, but one of the most telling is that:

Adams fails to replicate the Bible’s own attitude. For example, many of the Solomonic proverbs (evidence) a wide-ranging curiosity about the natural world not dependent on divine revelation: “much of the wisdom contained in Proverbs could have been discovered by a secular sage of the Ancient Near East or of contemporary America.”

B: The Definition of Biblical Counseling

Regarding the narrower question of how to define counseling biblically, John D. Carter questions the choice of nouthesis as the biblical term for counseling. Noting that nouthesis and its cognates occur only thirteen times in the New Testament, Carter offers the suggestion that:

parakaleo and its cognate paraklesis make a much more adequate model of counseling from a biblical perspective. These words and concepts are much more central biblically. Together they are translated in the King James Version 29 times as “comfort,” 27 times as “exhort,” 14 times as “consolation” and 43 times as “beseech” and infrequently as “desire, entreat, and pray.” Furthermore and perhaps of greater import, paraklesis is listed as a gift to the church (Romans 12: 8) . . .

31 Lawrence J. Crabb, Jr., Understanding People: Deep Longings for Relationship (Grand Rapids: Zondervan, 1987), 54-55.
32 Ibid., 57-58.
The concept is broad enough to support a variety of therapeutic techniques from crisis intervention to depth therapy and it is a gift given to the church which is clearly different than the gift of prophet or teacher. On the other hand, nouthesia represents a rather narrow range of functioning which Christians are to engage in, but does not have the status of a gift to the church and does not have the centrality that Adams wants to give it.34

Although Adams makes only limited use of paraklesis, he does refer to it. For instance, he notes that:

The guiding and teaching function of the biblical counselor is seen clearly in John 14: 26, 16: 13. His methods as Counselor are described in John 16: 7-15. The Spirit as Counselor is so concerned with counseling by teaching and leading into truth that He is specifically designated “the Spirit of truth” John 14: 17.35

Elsewhere, Adams has in fact acknowledged that he dislikes the word “nouthetic” and uses it reluctantly, because nouthesis appears almost exclusively in Paul and is not universal; other terms are used by other biblical writers.36 However, he is insistent that the elements of nouthetic counseling as defined earlier encompass the content of biblically defined counseling. Several of his critics, on the other hand, suggest that nouthetic counseling is part of the biblical approach, but needs supplementing. David Carlson, for instance, proposes a three-fold model of counseling styles corresponding to different biblical approaches: “prophetic-confrontational, pastoral-conversational, and priestly-confessional,” with Adams fitting exclusively in the first category.37 As we shall see, some of Adams’ colleagues have also seen the need to fill out the biblical picture.

C: Relationship to Psychology and Psychiatry

In his critique of nouthetic counseling, John Carter takes note of the fact that Adams’ Ph.D. is in speech, not psychology, and that he had only experienced a summer internship with O. Hobart Mowrer, a psychologist known for his research on behavior therapy and his emphasis on taking personal responsibility.38 This is related to two areas of criticisms – that Adams has inadequate training in psychology and that he reflects the influence of Mowrer. To take up the second point first, nouthetic counseling, according to Carter,

38 Adams also studied with a Freudian psychiatrist at Temple University.
“has all the assets and liabilities of a confrontational-behavioral-responsibility approach (e.g. Mowrer).” The focus is on observable external change rather than internal processes. His “strong emphasis on behavior and confrontation appears to have come directly from Mowrer and to have blinded Adams to the Scriptures’ emphasis on the inner aspects of man in sin.” Adams’ claims to greater and more rapid success for his approach are difficult to substantiate, but “one of the reasons for his apparent success is its surface character.”

As to Adams’ perceived inadequacies in psychology, he “fails to understand the psychologists he most severely criticized, namely Rogers and Freud.” His “psychological naïveté” is evidenced by his reference to the Freudian concept of transference as attributable to “Rogerians and other Freudians.” Neither Freud nor Rogers would recognize themselves in Adams’ critique. The reason for this, according to Carter, “appears to be that he has never read the original authors (or at least understood them) as indicated by his failure to cite their original works.” Apart from two references to Freud’s works and five to Rogers’ in Adams’ three major works under consideration – unless Carter has “overlooked a reference or two to either author”– Freud and Freudians and Rogers and Rogerian therapy “are repeatedly described from secondary sources.” Mowrer and Skinner “are both less frequently and less harshly criticized,” although they are also rejected as unbiblical.

The implication that Adams lacks psychological training and expertise is one which several other critics have made. David Powlison makes reference to several of them in his doctoral dissertation. He then observes that (according to the critics) Adams’ alleged “ignorance and unfairness” relative to the major theorists “arose from an identifiable source. He was indebted to Mowrer far more profoundly than he acknowledged.” Adams might “disclaim Mowrer’s influence as nothing more than clearing the ground of Freudian influences.” Yet, “to critics who read Mowrer and Adams side-by-side, it was evident that the entire structure of (his) theory was Mowrerian.” Although Adams has repeatedly and vehemently denied being a disciple of Mowrer, some critics see this as evidence that he is in fact a crypto-disciple; he “brings secular principles through the back door.”

Adams has also been called a popularizer of the psychiatrist Thomas Szasz, author of The Myth of Mental Illness and other works (to which

39 Carter, 152-154.
42 Carter, 154.
43 Powlison, “Competent to Counsel?”, 340-341.

The Dutch pastoral theologian Prof. C. Trimp is also of the opinion that Adams has replaced Szasz’s “social model” with a “religious model” and this leads to oversimplification.\footnote{Hielema, 244.}

Some of the above criticisms have found an echo among Adams’ closest associates. Most notably, his friend and co-founder of nouthetic counseling, John Bettler, among other criticisms, argues that “many biblical counselors have been unfair to their enemies, the psychologists.” He thinks that Adams has “often treated psychologists unfairly, setting up straw men easy to demolish.”\footnote{Powli son, 387.}

D: Means and Methods of Behavioral Change

Richard Lovelace, in his Dynamics of Spiritual Life, suggests that “The counseling approach which is most likely to help in congregational renewal is a tuned and adapted form of nouthetic counseling.”\footnote{Richard F. Lovelace, Dynamics of Spiritual Life: An Evangelical Theology of Renewal (Downers Grove, IL: InterVarsity Press, 1979), 218.} He goes on, however, to make some serious criticisms of the nouthetic approach including the charge that it:

simply operates with the Pelagian model of the Christian life common in modern Evangelicalism, assuming that sin problems are only habit patterns of disobedience which can be broken down by the application of will power in a process of dehabituation. This is a view of sanctification which will work in some instances, especially on persons who have been looking for easy victories through faith and neglecting the vigorous engagement of the will. But it does not penetrate the depth of the problem of indwelling sin and provide a dynamic to overcome it. Thus, at times it will amputate the surface manifestations of sin without disturbing the roots of the flesh and produce a pharisaical self-righteousness. In other cases it can lead almost to despair as the counselee attacks an iceberg of concealed sin with efforts at discipline and will power. This approach to counseling . . . is not sufficiently evangelical because it
fails to see that progress must be grounded in the appropriation by faith of the benefits of the union with Christ.\(^{49}\)

On the face of it, the charge of Pelagianism – surely the ultimate insult to a Reformed theologian! – seems extreme. *A Theology of Christian Counseling*, not to mention Adams’ other writings, show him to be well within the orthodox Reformed understanding of the doctrine of man. Indeed, his chapter on the nature of man is among the most satisfying descriptions of human nature (including concepts of body, soul, mind etc.) available in print. However, Lovelace’s perception is that nouthetic confrontation calls for change at the behavioral level which *appears* to be Pelagian in its inadequate attention to the motives of the heart. Others have made the same charge. John Carter goes so far as to say that Adams has “two theologies: one (Reformed) which he professes; the other (Pelagian) which he practices in his counseling model.”\(^{50}\)

William T. Kirwin, formerly of Covenant Theological Seminary, offers similar criticisms of Adams’ behavioristic use of Scripture, including the following:

Jay Adams advises depressed people to change their sinful behavior patterns: “Go ahead and do it... No matter how you feel. Ask God to help you” (Adams 1973, 379).\(^{51}\) That advice takes too mild a view of the fall and its effects on human functioning. The will, along with the cognitive and affective aspects of the heart, has been badly damaged; to a large extent human beings no longer have control over themselves.\(^{52}\)

The above is buttressed by a lengthy quote from Cornelius Van Til to the effect that “(b)efore the fall man’s will controlled his subconscious life, while after the fall man’s subconscious life controlled his will.”\(^{53}\) Adams might well counter that Van Til is referring to unregenerate man without the Holy Spirit’s power, but the fact remains that the perception is widely held that Adams fails to account adequately for the prevailing effects of sin on the will and that his “biblical behaviorism” is theologically deficient.

A helpful corrective to Adams’ emphasis on external behavior over internal processes of the heart is found in Hielema’s critique, where he refers to H. Jonker’s term “orthognosie” (cf. *orthognosis*):

\(^{49}\) ibid., 218-219.
\(^{50}\) Powlison, 316.
He (Jonker) used this term to elaborate upon the thought that we are not only to be concerned about “ortho-doxy,” the right doctrine, but also “ortho-praxis,” the right deed. The jump from “doctrine” to “deed,” Jonker holds, cannot be made. The missing link between “ortho-doxy” and “ortho-praxis” is “ortho-gnosis.” Ortho-gnosis is the right knowledge of God, the inner attitude of faith. This is indeed a very useful term that should be employed in pastoral theology. If we expect too much from “methods” and “techniques” in the praxis of pastoral work we reduce the Gospel of Jesus Christ to a mere “object.” This would prove to be a fruitless and “legalistic” procedure.54

Hielema’s overall critique, it should be pointed out, is not entirely negative. Among other positive evaluations of Adams throughout his work, he includes a useful and largely favourable comparison with Calvin on Scripture, discipline and holiness.55 By implication and despite the strictures quoted earlier, this places Adams well within the Reformed tradition in terms of Scripture and its application. But what the quotation from Jonker in particular implies is that he (Hielema) shares a widespread impression that Adams moves too quickly from the biblical text to behavioral application without sufficient attention to the cultivation of “the inner attitude of faith.” Elsewhere, Hielema quotes C. Trim as saying that it is nothing but “Legalistic-methodistic” to view biblical change, as Adams does, to be effected by a “pattern” that is reversed by “(b)eginning an upward cycle of righteousness resulting in further righteousness.”56

Some Developments in Nouthetic Counseling

A: The Sufficiency of Scripture

The main distinctive of those who insist on a biblical counseling methodology is that they self-consciously begin with the Scriptures. Their writings are filled with biblical references, and psychological insights are brought in only in a secondary and tentative manner, whereas often Christian psychologists tend to start with psychology and use the Scripture to back up their views. Thus, it comes down not so much to whether one is committed to the final authority of Scripture in principle, but to how well and how consistently one actually uses the Scriptures in counseling theory and practice. This is how David Powlison ends an article called “Which Presuppositions? Secular Psychology and the Categories of Biblical Thought”:

1. Does the momentum behind a particular idea come from Scripture or psychology?

54 Hielema, 263.
55 Ibid., 170-171.
56 Ibid., 244.
2. Is the God-ward referent in immediate evidence when discussing human behavior, motives, norms, problems, solutions and so forth? Or is psychology the moving force in a system, and Scripture is employed essentially to window dress and proof text?

3. Do the observations of psychology illustrate and apply biblical categories of thought about human life? Or is Scripture used to provide illustrations, applications and parallels to secular categories of thought?57

In another article, Powlison has described the difference between biblical counselors and Christian psychotherapists as follows:

Most Christian psychologists view the Bible as an inspirational resource, but their basic system of counseling, both theory and methods, is transferred unaltered from secular psychology . . . .

Some Christian psychotherapists use few Scriptures; others use many. But frequency of citation is much less important than the way passages are used – or misused – and in the vast majority of cases the passages cited are completely misused. There is a dearth of contextualized exegesis (a critical interpretation of a text) and an abundance of eisegesis (interpreting a text by reading one’s own ideas into it). Biblical counseling is committed to letting God speak for Himself through His Word, and to handling the Word of Truth rightly (2 Tim. 2: 15). 58

Powlison has attempted to address the evangelical psychotherapeutic establishment, calling it to recognize the radical nature of biblical presuppositions in counseling theory, noting that:

a biblical view of presuppositions provides a sharply distinct alternative to any and all forms of secular thinking. It provides a truly coherent rationale for science. It provides a solid, biblical theoretical foundation for counseling people. It accounts for and appreciates the insights of psychology without losing sight of the pervasive distortion within each insight. 59

In a lecture given at a counseling conference sponsored by the Christian Counseling and Education Foundation, John Bettler, who was then Director of the CCEF and a faculty member at Westminster Theological Seminary, urged that “one of the signs that the movement called biblical counseling has been a success is that we have disagreements!” Arguing that differences of style and emphasis should not be dismissed as less biblical than others, he asked, “To what irreducible commitments must you adhere in order to deserve the title ‘biblical’?” Bettler’s answer is to follow the historical model of establishing confessions of faith to define the parameters of biblical orthodoxy. Taking the specific example of the place of the past in the life of a counselee, Bettler states:

I want us to do the dangerous job of drawing circles, drawing lines. Anybody within the circle is biblical, anybody outside the circle is not. That is a tough thing to do and there are dangers. Some of us might want to push the circles real wide; that tends towards liberalism. Others of us might want to narrow the circles as tightly as we can; that tends toward becoming cultic or sectarian. We want to be biblical in dealing with the past. We want to search the Scripture to find commonality in this and other crucial counseling areas. Confession making is dangerous, but I believe it is essential. We have to do it in complete dependence upon the wisdom of the Holy Spirit. We need God to give us wisdom to be a community of learning so that we can learn from one another and stimulate one another unto good works.  

The Fall 2000 issue of The Journal of Biblical Counseling features a series of “Affirmations & Denials: A Proposed Definition of Biblical Counseling” by David Powlison. It is intended to be a draft of the type of confession making referred to by Bettler. The following affirmations and denials speak to the issue of Scriptural sufficiency:

We **affirm** that the Bible is God’s self-revelation in relation to His creatures, and, as such, truly explains people and situations.

We **deny** that any other source of knowledge is authoritative for explaining people and situations.

We **affirm** that the Bible, as the revelation of Jesus Christ’s redemptive activity, intends to specifically guide and inform counseling ministry.

We **deny** that any other source of knowledge is authoritative to equip us for the task of counseling people.

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We affirm that wise counseling requires ongoing practical theological labor in order to understand Scripture, people and situations. We must continually develop our personal character, case-wise understanding of persons, pastoral skills, and institutional structures.

We deny that the Bible intends to serve as an encyclopaedia of proof texts containing all facts about people and the diversity of problems in living.61

Few nouthetic counselors would have difficulty with such a statement. It upholds the sufficiency of Scripture and (although not explicitly stated as such) its superiority to general revelation, in contrast to many Christian psychologists who place them on an equal footing. It also seeks to avoid the charge of proof-texting. Differences arise not so much in the commitment to biblical counseling but in the application, including an avoidance of defining biblical counseling by the term “nouthetic.”

B: The Sufficiency of Nouthetic Counseling

In the early days of the CCEF, John Bettler edited a newsletter called Nouthetic Confrontation. Later he changed the name of the newsletter to Momentum, explaining that since nouthetic counseling was now gaining momentum, it was time to move beyond the necessarily confrontational image of the movement's beginning to develop a more positive approach. In a later publication, he expressed concern that nouthetic counselors had a “tendency to twist the Scriptures to substantiate (their) conclusions.” He accused his friend Jay Adams of sometimes “making the Scripture say something it never intended to say.” Bettler also echoes the common charge of illegitimate proof-texting and emphasizing some biblical themes to the neglect of others.62

David Powlison uses the image of a fence surrounding the field of biblical counseling to describe the relationship between “the more authoritative, frankly remedial elements of counseling and the more mutual, ongoing encouraging elements.” He writes (with lay counseling particularly in mind):

Our goal is systematically biblical counseling, the ministry of God's truth in love. The ‘nouthetic part’ of biblical counseling is the ‘fence.’ It is the backup mode of biblical counseling. It is for when the sheep leave the green pastures to wander out into the desert. The ‘paracletic’ part of biblical counseling is the ‘field.’ It is the primary mode of biblical counseling, containing all the mutual

edifying, encouraging, one anothering, nourishing, praying and loving that is the normal Christian life. It is as much a two way street as possible. It is as egalitarian as possible. It is as biblically ‘nondirective and client-centered’ as possible. The truth content and goals of counseling are invariable, fixed by Scripture. This same Scripture tells us God uses many different forms of relationship to write His Word on our hearts.63

Elsewhere, Powlison has noted the frequent criticism of Adams for choosing noutheteo rather than parakaleo as his defining term for biblical counseling. But he agrees with Adams that:

the choice of words is indifferent – they can cover the same semantic field. Both words involve God’s truth applied to lives, both words communicate love and concern, and both words communicate an appropriate directness and toughness.64

Be that as it may, it is unmistakably the case that Powlison, like Bettler, prefers to speak of “biblical” counseling more generally, and tends to avoid the negative connotations which have (rightly or wrongly) come to be associated with “nouthetic.”

C: Relation to Psychology and Psychiatry

Bettler distinguishes between “recycling” and the “integration” of theology and psychology popular among psychotherapists. His view is reflected in a course description from a brochure produced by the CCEF:

The course avoids their wholesale acceptance (“integration”) which destroys Scripture’s authority. It also avoids outright rejection, which robs the Christian counselor of the stimulus of secular insights. Instead a “recycling” model is proposed to maintain the Bible sufficiency as well as sharpen your understanding of biblical teaching . . .

Powlison evidences some ambivalence over the question of integration. In an article “Critiquing Modern Integrationists” he discusses various types of integration. There follows some helpful material on how biblical Christians should view and use psychology and minister to the “psychologized.” Using Calvin’s analogy of the Scriptures as eyeglasses by which God corrects our sin-tainted vision, Powlison notes that:

64 Powlison, “Biblical Counseling in the Twentieth Century,” 51n.
The goal of biblically reinterpreting human experience – whether described by a counselee or a psychologist – is not “look how much we can learn from them.” The goal is the ministry of the Word that concerns the soul. On the one hand, integrationists do not see that the payoff of a valid biblical interaction with psychology must be the conversion of the psychologized. On the other hand, biblical counselors who do not do the hard work of reinterpreting error, standing it on its head, miss an opportunity for effective ministry...  

But what is the alternative to integration? In his “Crucial Issues in Contemporary Biblical Counseling,” Powlison writes that:

The relationship of presuppositionally consistent Christianity to secular culture is not simply one of rejection. Half of what biblical presuppositions give us is a way to discern the lie that tries to make people think about themselves as autonomous from God.

But the other half of what biblical categories do is give us a way of appreciating, redeeming and reframing the culture of even the most godless men and women. We are, after all, even able to use the data gathered from godless counselees, reinterpreting their own perceptions back to them in biblical categories that turn their world inside out and upside down!

In his contributions to the book *Psychology & Christianity: Four Views*, Powlison defends biblical counseling and critiques three other approaches. More recently, he has noted that, while Christian psychologists in general became more explicitly biblical in the 1990s:

the “biblical counselors” have also changed. Their writings now evidence a broader scope of concerns and concepts than they had in the early 1970s. They have supplemented, developed, or even altered aspects of Adams’s initial model. They are paying a great deal of attention to (1) intrapersonal dynamics such as motivation theory, self-evaluation, belief, and self-deception; (2) the impact of and response to varieties of suffering and socialization; (3) the compassionate, flexible, probing, and patient aspects of counseling methodology; (4) nuances in the interaction between Christian faith and the modern psychologies; (5) the practicalities of marital and

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familial communication; and (6) the cause and treatment of so-called addictions. The model of biblical counseling is now more detailed and comprehensive about any number of “psychological” matters.  

Still, while “the psychologists seem more biblical and the biblical counselors seem more psychological,” Powlison continues to believe that “the two visions are still fundamentally incompatible” (his italics). However, he also believes that “our current situation is ripe for a fresh articulation of the issues. . . . The core question turns on the intent and scope of Scripture, the nature of pastoral theological work, and the degree of significance attached to what the church can appropriate from the world.”

Edward Welch (like Powlison, a faculty member and counselor at CCEF) does not deal so much with the sufficiency of Scripture or the integration of Scripture and psychology at a theoretical level. Rather, as a licensed psychologist himself, his interests are more in application, especially the psychiatric study of the brain. His criticisms of secular psychology and Christianized versions of them are very much along the lines of nouthetic orthodoxy. But because he is careful to discern what can be legitimately learned, his criticisms are all the more compelling. The subtitle of his book, *Blame It on the Brain?*, expresses well his approach: *Distinguishing Chemical Imbalances, Brain Disorders and Disobedience*. Following a biblical study of the mind-body relationship, Welch moves on to “Brain Problems Seen Through the Lens of Scripture.” Two chapters are devoted to dementia associated with Alzheimer’s disease and head injury from accidents respectively, under the heading “The Brain Did It.” Here the goal is to provide “a method for approaching physical problems and gaining experience in distinguishing issues of the heart from physical weakness.” Next come chapters on depression and attention deficit disorder titled “Maybe the Brain Did It.” Finally homosexuality and alcoholism are studied as examples of “The Brain Didn’t Do It.”

A valuable insight which Welch offers is that the brain can reveal what is in the heart. Thus, for instance, in the case of a hitherto morally upright Alzheimer patient who begins to use crude and lustful language, he is no longer able to disguise the state of his heart as he once was. In each area of application, Welch stresses the need to first of all “get information,” then “distinguish between spiritual and physical symptoms.” This, in turn, leads to ad-
dressing heart issues on the one hand and maximizing remaining strengths, while correcting or minimizing weaknesses on the other. Thus, in his discussion of depression, Welch notes that:

If depression consisted solely of spiritual problems, there would be no reason to talk about medication and other physical treatments. But depression does have physical symptoms. Therefore, medical treatment might be helpful to ease or erase the physical symptoms of depression (and those of other psychiatric problems).\(^{73}\)

Welch’s *Counselor’s Guide to the Brain and Its Disorders: Knowing the Difference Between Disease and Sin* provides a somewhat more technical treatment of the uses and abuses of medication.\(^{74}\) Elsewhere, contrary to Adams’ approach, which encourages the counselor to assume a sin connection in the absence of clear evidence to the contrary, Welch cautions that to “reduce a person’s suffering to the consequences of their own sin, especially when we don’t have clear knowledge of the situation, is unbiblical and potentially destructive.”\(^{75}\)

This leads to another caution in which Welch’s approach differs from Adams’:

To the degree that depression is, in fact, a form of suffering, then we have no biblical guarantee that it will be eradicated from our lives. We do have something close to a biblical promise that suffering, and therefore depression, will be lightened as we grow in Christ, but lightened does not mean depression-free.\(^{76}\)

No careful reader of Welch comes away with the impression that he is soft on sin. Rather, precisely because he is so careful to distinguish between heart and brain issues, his treatment of the heart is all the more thorough and penetrating. His treatment of homosexuality and alcoholism are especially helpful in this regard.

**D: Means and Methods of Behavioral Change**

When it comes to the actual process of helping people change behaviorally in a biblical manner, both Welch and Powlison make substantial use of

\(^{73}\) Ibid., 125.


two important categories. The first, and most pervasive, is what they call “idols of the heart.” A second related insight is that we both sin and are sinned against. Both of these concepts go beyond simply identifying sinful behavior and calling for repentance.

Powlison develops his approach in an article, “Idols of the Heart and ‘Vanity Fair.’” It is a discussion of the relationship between the biblical emphasis on idolatry and the psychological question of how to “make sense of the myriad significant factors which shape and determine human behavior.” While the notion of idolatry most often emerges as a polemic against worship of physical images and false gods, Scripture also internalizes the problem as in Ezekiel 14:1-8. The First Great Commandment, to love God with heart, soul, mind and might, also demonstrates the essential “inwardness” of the law regarding idolatry. “The language of love, trust, fear, hope, seeking, serving – terms describing a relationship to the true God – is continually utilized in the Bible to describe our false loves, false trusts, false fears, false hopes, false pursuits, false masters.”

If “idolatry” is the characteristic Old Testament word for “our drift from God,” then “desires” is the New Testament counterpart. “The New Testament language of problematic ‘desires’ is a dramatic expansion of the tenth commandment, which forbids coveting . . . (and) internalizes the problem of sin, making it ‘psychodynamic.’” It:

lays bare the grasping and demanding nature of the human heart, as Paul powerfully describes it in Romans 7. Interestingly (and unsurprisingly) the New Testament merges the concept of idolatry and the concept of inordinate, life-ruling desires. Idolatry becomes a problem of the heart, a metaphor for human lust, craving, yearning and greedy demand.

The Bible also treats idolatry as “a central feature of the social context, ‘the world,’ which shapes and moulds us.” Like “Vanity Fair” in Bunyan’s Pilgrim’s Progress, it can be seen as “portraying the interaction of powerful, enticing and intimidating social shapers of behavior with the self-determining tendencies of Christian’s own heart.”

The fact that idols allure us from both within and without “has provocative implications for contemporary counseling questions.” For instance, “the life patterns often labelled ‘co-dependency’ are more precisely and penetratingly understood instances of ‘co-idolatry.’” The idolatry motif helps relate three factors which enter into counseling situations: people are responsible

78 Ibid., 3.
79 Ibid.
80 Ibid.
81 Ibid., 4.
for their own problems, their problems are shaped by external influences including traumatic influences such as loss or victimization, and problem behavior is often driven by deep-seated motives of which a person may be “almost wholly unaware.”

Powlison asserts that “The Bible’s view of man – both individual and social life – alone holds these things together.” This is because human motivation is always “with respect to God.” The biblical theme of idolatry provides a “penetrating tool” for understanding both the “springs of and inducements to” sinful behavior.

The causes of particular sins, whether “biological drives,” “psychodynamic forces from within,” “socio-cultural conditioning from without,” or “demonic temptation and attack from without” can be truly comprehended through the lens of idolatry. Such comprehension plows the field for Christian counseling to become Christian in deed as well as name, to become ministry of the many-faceted good news of Jesus Christ.

“What happens to the Gospel when idolatry themes are not grasped?” Powlison asks:

When “the Gospel” is shared, it comes across something like this: “God accepts you just as you are. God has unconditional love for you.” This is not the biblical Gospel, however. God’s love is not Rogerian unconditional positive regard writ large. A need theory of motivation – rather than an idolatry theory – bends the Gospel solution into “another gospel” which is essentially a false gospel.

The Gospel is better than unconditional love. The Gospel says, God accepts you just as Christ is . . . God never accepts me as-I-am. He accepts me as-I-am-in-Christ. The centre of gravity is different. The true Gospel does not allow God’s love to be sucked into the vortex of my soul’s lust for acceptability and worth in and of myself. Rather, it radically decenters people – what the Bible calls “fear of the Lord” and “faith” – to look outside themselves.

Christian counselors with a “psychologizing drift” are susceptible to the above distortion of the gospel. However, Christian counselors with “morali
tic tendencies” have a different set of problems. Christ’s forgiveness is “typically applied simply to behavioral sins.” The content of the gospel “is usually more orthodox than the content of the psychologized Gospel, but the scope of application is truncated.” Those with “psychologizing tendencies” at least

82 Ibid., 5.
83 Ibid., 8-9.
84 Ibid., 17-18.
notice our “inner complexities and outer sufferings, though they distort both systemically.” In some ways, “the moralizing tendency represents an inadequate grip on the kind of ‘bad news’ which this article has been exploring.”

Powlison’s examples of “moralistic tendencies” are of the “let go and let God” and “total yieldedness” approaches of “a single act of first-blessing or second-blessing housecleaning,” with little sense of the “patient process of inner renewal.” These examples do not apply to Jay Adams or nouthetic counselors in general, who stress progressive sanctification, but Powlison has elsewhere conceded that the criticisms of “moralism” and “behaviorism” hit home there also.

Welch’s treatment of these themes is most thoroughly and helpfully developed in When People Are Big and God Is Small. However, while reference will be made to this work, it may be sufficient for our present purposes to summarize his use of these concepts in an article on “Codependency and the Cult of Self.” Here, after outlining the popular codependent movement, he asks, “If we are not to use the categories of ‘self-esteem,’ ‘unmet needs,’ ‘codependency,’ and the notion of the basically good ‘child within,’ what descriptions rise out of biblical categories?” The answer:

According to Scripture, we are sinners by birth (original sin) and sinners by choice. Sin is a condition arising from a fallen nature that is hostile to God, and this condition produces personal choices and actions that are sinful. But because we are all sinners, there is a third element: although we are sinners by birth and sinners by choice, we are also sinned against. There is a legitimate place in Scripture given to the idea that we both victimize others and are ourselves victims of the sinful actions of other people and institutions . . .

Next, we come to the concept of idolatry. “The characteristic strategy of idolatry is to take something that is fine in itself and exalt it so that it rules the person.” Thus, “being loved is a blessing. However, when it moves from godly desire to ruling passion or need, it is evidence of the sinful tendency to serve other gods, all ultimately in an effort to worship oneself.” It often “takes the mode of a quiet, unspoken conviction that because God does not meet all one’s needs, one can divide one’s allegiance and trust in idols in addition to God. Paradoxically, though, when we offer ourselves to idols we become their slaves. “That is idolatry: seeking to control, but being controlled.”

85 Ibid., 18.
86 Ibid.
88 Ibid., 234-236.
Welch and Powlison are both critical of all “needs” theories, including those of Larry Crabb, whom they nevertheless recognize as being closer to their own position than others (e.g. Minirth-Meier who adopt the codependency model). Although appreciative of Crabb in several respects, Powlison indicts him for “following the logic of Maslovian and object relations psychologies in absoluting a need or yearning for security in intimate relationships.”

Welch, likewise, finds Crabb’s change of terminology from “needs” to “deep longings” to be unsatisfactory. He is concerned that this means “we have a longings problem that is at least as deep as our sin problem.”

Welch believes that instead of finding the source of psychological needs in our creation in the image of God, we should look for it in the Fall where:

the direction of the human heart became oriented not toward God but toward self . . . Is it possible that the “I want” of Adam is the first expression of psychological needs? Is it that psychological yearnings come when we refuse to love God and receive his love?

In an article titled “Is Biblical-Nouthetic Counseling Legalistic? Re-examination of a Biblical Theme,” Welch first defines legalism as “the prideful motives and purposes behind the legalistic tendency that is resident in everyone.” He shows how legalism and slavery are companions, then notes that, conversely, “faith is inseparable from freedom and sonship.” Sonship is Paul’s preferred contrast to the slavery of legalism. Slaves under the law have now received “the full rights of sons, so you are no longer a slave, but a son; and since you are a son God makes you an heir (Galatians 4: 5, 7).” The juxtaposition is dramatic. The experience of the adopted child includes:

An unfailing relationship characterized by love;
Acceptance based on the performance of Christ rather than our own;
Forgiveness rather than repayment;
Being known and understood;
The promise of even greater things (an eternal future);
Transformation into the image of the Father by the indwelling Spirit of sonship; therefore there is power to obey.

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90 Welch, When People Are Big and God Is Small, 146.
91 Ibid., 148.
Turning away from sin is undeniably part of obedience. But it is a response to the gospel (the death and resurrection of Jesus) not commensurate with it. . . .

In *When People Are Big and God Is Small*, Welch deals extensively with the biblical concept of the fear of God as an antidote to the fear of man. He ends the book with a chapter titled “The Conclusion of the Matter: Fear God and Keep His Commandments.” This is preceded by separate chapters on loving our enemies and neighbors and loving our brothers and sisters. These are familiar themes of nouthetic counseling. But before getting to them, Welch devotes a chapter to “Delight in the God Who Fills Us.” Here he spends time on the biblical story of Hosea’s love for his unfaithful bride, Gomer, as a model of God’s love for his unfaithful people, Israel, and Christ’s love for those for whom He gave His life:

Our God no longer calls us slaves. Through Jesus, he calls us friends, children, and his bride. Through his Spirit, he gives us the greatest gift we could ever have. He gives us himself. He says, “I am with you” (cf. John 14: 27-28). “Never will I leave you; never will I forsake you.” So we can say with confidence, “The Lord is my helper: I will not be afraid. What can man do to me?” (Heb. 13: 5-6).

There can be little question that any nouthetic counselor, Adams included, would endorse the above. However, it is the seeming lack of attention to this powerful biblical motivation that creates the impression of an imbalance in need of redress.

**Conclusion**

I am grateful to the editor for the invitation to write on the subject of this article. In its present form, the article is a slightly updated digest of a considerably longer research paper originally written in 2003. It may have benefited from more updating, but the basic argument is not affected by more recent developments.

In the original paper, I offered more background on Jay Adams, including the influence of Mowrer and later of Cornelius Van Til. For this, I drew largely from David Powlison’s doctoral dissertation, now available in published form as *The Biblical Counseling Movement: History and Context*. I also discussed such things as Adams’ approach to specific forms of suffering and his views on the role of Satan in suffering. The most significant omission

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93 Welch, *When People Are Big and God Is Small*, 179.
in the present article is a lengthy section in which I suggest that the “idols of the heart” motif, besides being eminently biblical, shows some affinity with Puritan approaches to pastoral counseling. Some direct Puritan influence is noted, particularly in an article by Timothy Keller, written for the 20th anniversary of the *Journal of Pastoral Practice*.\(^{95}\)

It would be foolish to suggest that the nouthetic-biblical counseling movement as a whole is following a Puritan direction. Nor, I believe, would it be correct to suggest that Welch and Powlison (much less Bettler) reflect a great deal of direct Puritan influence. However, their emphasis on the heart, and their recognition of the implications of being sinned against as well as of sinning, are compatible with at least indirectly mediated Puritan influences. Their more positive engagement with secular psychology also finds some parallel in Puritan thought, especially that of Richard Baxter, whose *Christian Directory* Keller calls “the greatest manual on Biblical Counseling ever produced.”\(^{96}\)

I would like to suggest that such influences move at least one element of the nouthetic-biblical counseling movement in a direction which offers the kind of biblically corrective critique which Adams claims he enthusiastically welcomes.\(^{97}\) Perhaps this is the kind of “tuned and adapted form of nouthetic counseling” which Richard Lovelace says “is most likely to help in congregational renewal.”\(^{98}\) But that is another study.

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96 Endorsement printed on the jacket of the Soli Deo Gloria reprint.
97 Adams, *Competent to Counsel*, 269.
98 Lovelace, 218.