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Superintendent Diane Douglas
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SCHOOL COUNSELOR FEEDBACK ON KEY PROVISIONS IN ESSA

Dear Superintendent Douglas:

On behalf of the Arizona School Counselor Association (AZSCA), thank you for the opportunity to submit comments and recommendations regarding school counseling provisions within The Every Student Succeeds Act (ESSA). AZSCA represents 1500 school counselors from throughout all corners of Arizona, and there is great excitement that ESSA references school counseling programs specifically. AZSCA supports school counselors' efforts to help students focus on academic, socio-emotional and college- and -career development so they not only achieve success in school but are prepared to lead fulfilling lives in the workforce and responsible members of society.

ESSA requires state education plans to align with entry requirements for credit-bearing coursework at a state public institution of higher education or to meet the state's college and career standards. To fully realize the underlying purpose of aligning secondary coursework with postsecondary entry standards (e.g., ensuring high school graduates are college- and career-ready), we urge the State Board of Education to issue guidance for LEAs to ensure school counselors have access to relevant professional development, to account for school counselor staffing in their needs assessments and to minimize school counselor time spent on non-counseling related activities.

Because school counselors are an integral component in student achievement and creating a college-going culture and a career-ready student body, we believe districts should include the status of school counselor staffing in their schools in comparison to the 250:1 student-to-counselor ratio recommended by the American School Counseling Association (ASCA) and the National Association for College Admissions Counseling (NACAC). In Arizona, we have the highest ratio in the country, with school counselor caseloads on average being 881. With ratios this high, it becomes increasingly difficult for school counselors to provide robust and personalized services and instruction to all students. We recommend that the State Board of Education encourage LEA's to provide counselor caseloads as close to 250:1 as possible.

School counselors are regularly assigned responsibilities that deviate from their professional expertise or purpose on staff. The more time school counselors spend administering tests, substitute teaching or participating in other non-counseling activities, the less time they have to spend on direct services and instructional classroom program delivery. Maximizing time school counselors spend with students in group, classroom or one-on-one setting, rather than on non-counseling activities, is critical for ensuring every student graduates prepared for career or college. We respectfully request that the State Board of Education issue guidance to LEAs about appropriate use of school counselor expertise, which includes educating and counseling students in social-emotional learning, academic achievement and college- and career readiness, but does not include test administration, other administrative tasks, or other duties historically & routinely assigned to school counselors. We believe this guidance will help districts conduct the required needs assessments under Title I, Title IV Part A and in the reporting of resource inequities. In ESSA's Accountability, this guidance could also provide evidenced based results on "at least one other state-set indicator of school quality or student success".

Title IV provides an enormous opportunity to provide significant support to SEAs and LEAs in their efforts to educate the whole child. School Counseling Programs and school counselor skills are an indispensable inclusion in this title's provisions. Part A of this Title, the Student Support and Academic Enrichment Grant program (SSAEG), seeks to improve the capacity of SEAs and LEAs to (1) provide students with access to a well-rounded education; (2) improve school conditions for student learning; and, (3) improve the use of technology. When providing SEAs and LEAs with guidance under this program, it is important for the State Board of Education to take a holistic view of the best ways to educate students. We suggest that they do the following:

- assist LEAs with their required Title IV needs assessment by providing examples of methods other LEAs have used successfully to accomplish the goals of Title IV to educate the whole child;
- include guidance regarding the invaluable role a needs assessment and gap analysis should play in planning for the responsible use of federal funding. We recognize that the needs assessment is only required for those LEAs receiving more than \$30,000; however, we request that ED urge LEAs to consider completing a needs assessment to make the most-informed decisions possible, regardless of the level of funding received;
- provide guidance to help LEAs integrate diverse community-based stakeholders (e.g., community mental health providers and youth serving organizations) into the needs assessment process; and, convene a conference with SEAs, LEAs, key stakeholders, and policy experts to share information about best practices and effective use of funds under the SSAEG program; and,
- issue continued guidance addressing appropriate staffing ratios to be made available to LEAs when noting their current gaps and future needs.

Under Title II, Part A, LEAs can use professional development funds for, among other things:

- the techniques and supports needed to help educators understand when and how to refer students affected by trauma, and children with, or at risk of, mental illness; the use of referral mechanisms that effectively link such children to appropriate treatment and intervention services in the school and in the community, where appropriate;
- partnerships between school-based mental health programs and public or private mental health organizations; and,
- issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism

With regards to accountability and school report cards, AZSCA recommends that Education and Career Action Plans (“ECAPS”) are tied into school scores. This metric could consist of the number of students with a completed ECAP upon high school graduation. We also recommend that the student:counselor ratio be included in the report card as information to the family.

We appreciate the opportunity to offer these recommendations and look forward to working with you to develop appropriate guidance on the roles and importance of school counselors. For further information, please feel free to contact Meg Hughart, President of AZSCA (meghughart@gmail.com).

Sincerely,

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President
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