

OFFICE OF AUDITOR GENERAL



Student Counseling Audit Report

June 21, 2010



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Student Counseling Executive Summary

OBJECTIVE

To evaluate the operating control environment, Administrative Counseling, and oversight for the Office of School Counseling.

BACKGROUND

The Office of School Counseling supports the schools and students by providing certified School Counselors at secondary schools, serving students in grades 7-12. School Counselors address the developmental needs of all students through a school counseling program addressing the academic, career and social/emotional development of all students.

Through the work of the Office of Counseling, the District has increased access to college readiness activities. Sophomores and juniors are participating in PSAT exams and the number of RCSD students taking the SAT exams has been rising steadily to approximately 860 in 2009. There has also been an increase in student participation through college fairs where in excess of 1,200 students attend annually. Most notably, the Counseling Department, in March 2010, coordinated a major event to assist RSCD parents in completing college financial aid applications, which is often an intimidation barrier to college.

SCOPE

We will evaluate the effectiveness of the internal controls including operating protocols and school monitoring provided by the Office of School Counseling. We will determine if adequate controls have been implemented to ensure every student benefits from School Counseling programs.

We will collaborate with the key personnel to understand the current control environment and test the operating control environment. We will identify opportunities for improvement and issue recommendations to improve the control environment. Management will be asked to respond in writing to our recommendations within 30 days.



Student Counseling Executive Summary

CONCLUSION

The Office of Counseling is a small group of professionals with a significant role in supporting student performance from a personal/social, academic and career perspective. Uniform standards across the District would facilitate providing all students with comprehensive counseling activities at every grade level. We recognize that schools may have differences based on leadership expectations; however basic protocols should exist and be somewhat standard across the district. Counselors were aware of school counseling standards, but clarity surrounding standards that must be performed in areas of documentation, required student contact, and parent communication should be formalized to ensure consistent application by all individuals. Standard reporting should also exist at every school for each grade level to ensure that all students are formally monitored each year. Formal processes and forums should be established to allow sharing of best practices within the district. This practice would allow all schools to benefit from lessons learned from experienced counselors and the mature counseling programs.

Counselors are not required and therefore do not exist at the Elementary level. While this requirement does not exist, there still appears to be a need for the district to develop social competencies for elementary students prior to their arrival in a secondary environment. Counselors communicated that a significant amount of time is spent teaching students social/ personal competencies when they arrive in a secondary school building, development in this area could allow counselors to spend additional time in the academic and career domains.

We noted that counselors recognized the Director of Counseling as a good resource for technical guidance. We believe the Director of Counseling should also be used as a resource to Principals for ensuring that all school counseling programs effectively align with organizational goals for student achievement. Collaboration with Principals and annual assessments of counseling programs could provide a valuable resource in this specialty area for administrators.

The Office of counseling has implemented several initiatives to increase the college readiness such as PSAT exams for sophomores and juniors, college fairs, increased students participating in the SAT exam and financial aid assistance. These opportunities show the counselor's commitment to making RCSD students college ready.



Student Counseling Summary of Recommendations

Rec#	Recommendations
1	<i>Establish a clear governance structure for consistent standardized district-wide counseling activities. Provide more direct guidance for counseling activities at schools with structured documented feedback from the Director of Counseling for individuals responsible for the school counseling function.</i>
2	<i>Define, communicate and monitor to ensure that all key Counselor roles and responsibilities are performed.</i>
3	<i>Establish comprehensive operating procedures for the Office of School Counseling.</i>
4	<i>Establish, communicate and train Counselors regarding documentation that should be maintained in student counseling files.</i>
5	<i>Establish and communicate formal monitoring procedures that will identify how all students should be monitored which will include monitoring frequency and escalation procedures for intervention.</i>
6	<i>Consider establishing a cross-functional team to discuss and identify, communicate and remediate common and emerging issues for students. Remediation should include a plan for implementation at schools including delegated responsibility.</i>
7	<i>Establish and communicate guidelines to facilitate what types of events should initiate parent contact or additional human service resources. Designate responsibility for coordinating communicating to resources on a timely basis.</i>
8	<i>Implement standard system reports which provide administrators with critical graduation readiness information for each grade level.</i>



Student Counseling Summary of Recommendations

Rec #	Recommendations
9	<i>Implement district-wide personal/social developmental skills that will be taught to students at each specific grade level. Utilize Social Workers to facilitate identification of milestones and teaching developmental skills training due to their expertise in this area.</i>
10	<i>Consider establishing a process that obtains counselor input for Professional Development. At a minimum, provide Urban Professional Development for counselors.</i>
11	<i>Consider including the Director of Counseling present in assessing Counselor performance and providing evaluation feedback.</i>



Student Counseling Observations, Recommendations and Action Plans

OBSERVATION #1

Governance

There is a lack of clear governance and oversight for the District-wide counseling function. Principals, or their designee, have daily responsibility for all school related personnel, which includes the counseling function. In each school-based counseling department, according to ASCA guidelines, counselors should address student needs from three domains: social/ personal, academic, and career perspectives. It was not evident that all three domains were not performed by all counselors. Counselor roles varied. Some counselors focused on social/personal issues, some filled in for absent administrators, and some were expected to focus on monitoring student grade information. It is not clear that adequate guidance has been provided to identify what Principals can expect from counselors and clarify the level of support that should be provided by the Director of Counseling.

RECOMMENDATIONS and MANAGEMENT RESPONSES

Clarify the role of the Director of Counseling and obtain agreement regarding responsibility for governance of counseling activities. Communicate these clear guidelines throughout the organization.

Management Responses: The Director of Counselor job description will be reviewed and revised to reflect clearer expectations. The Director will use her knowledge, experience, administrative authority to leverage and create an official infrastructure in each school. This infrastructure will facilitate and support the collection of informational reports such as academic and intervention data. A Lead Counselor position will be created to support the school- building Counselors and the Principals. The goal is to align efforts and outcomes with the District wide college going culture, connections to higher education, RTI, Parent engagement, student career awareness exploration and any additional support to ensure student success.

Responsibility: Gladys Pedraza-Burgos, Chief Youth Development and Family Services

Due Date: October 31, 2010



Student Counseling Observations, Recommendations and Action Plans

OBSERVATION #2

Roles and Responsibilities

There is a lack of clarity surrounding the critical roles that the Counselor should perform. Principals had different responsibilities for Counselors at the schools. There are three domains that a counselor is expected to focus on. All three domains were not performed by all Counselors. Principals expected individual Counselors to focus on social/personal issues, fill in for absent administrators, and some were expected to focus on monitoring student grade information.

We recognize that each Principal can select an effective method for their building; however, it was not clear that all counseling activities were being performed. Clear definition of Counselor responsibilities should be established to ensure all key functions are performed for all students.

RECOMMENDATIONS and MANAGEMENT RESPONSES

Define, communicate and monitor to ensure that all key Counselor roles and responsibilities are performed.

Management Responses: The counselor job description and expectations have been revised according to the American School Counselor Association, ASCA and New York State School Counselors Association, NYSSCA. The director of School Counseling will meet with every Principal to reinforce the counselor expectations. Written records will be maintained to capture contact with Principals. Although the school Principal is responsible for daily monitoring, on an annual basis the Director of Counseling will perform an assessment of the counseling programs at the schools from a technical perspective.

Responsibility: Gladys Pedraza-Burgos, Chief Youth Development and Family Services; Dr. Bonnie Rubenstein, Director of Counseling

Due Date: December 31, 2010



Student Counseling Observations, Recommendations and Action Plans

OBSERVATION #3

Standardized Operating Procedures

There is a lack of comprehensive District-wide protocols and procedures for the Office of School Counseling. There are also no Desk Procedures to communicate how to perform daily responsibilities. These procedures are individually created at each respective school, if it exists. The Office of School Counseling has started to document protocols; however, efforts should be made to ensure protocols are comprehensive, communicated and implemented by all counselors.

There should be counseling guidance provided to facilitate the counseling process. Inconsistencies across schools make it difficult to ensure counseling quality throughout the district. If basic counseling is provided, it can improve consistency in the quality of services provided. Schools should be able to personalize their procedures in order to meet their individual differences; however, a consistent baseline will improve counseling consistency.

RECOMMENDATIONS and MANAGEMENT RESPONSES

Establish comprehensive operating procedures for the Office of School Counseling.

Management Responses: During the 2009-10 school year the counselor manual was revised. The revisions have been forwarded to management for review. We are currently implementing recommended changes to the manual. We anticipate the updated manual will be forwarded to counselors in Fall 2010.

Responsibility: Gladys Pedraza-Burgos, Chief Youth Development and Family Services; Dr. Bonnie Rubenstein, Director of Counseling

Due Date: October 31, 2010



Student Counseling Observations, Recommendations and Action Plans

OBSERVATION #4

Counseling File Documentation Standards

Documentation standards do not exist for counseling files. Student file documentation varied across schools and counselors. Differences were also noted among counselors within individual school buildings. District protocols have not been established to identify what level of documentation should exist to substantiate counseling services. Some counselors communicated that they were advised to write very little in the files. We recognize that protecting student confidentiality must be considered, however counseling should be established to identify what documentation is prudent to support that adequate counseling was provided.

RECOMMENDATIONS and MANAGEMENT RESPONSES

Establish, communicate and train Counselors regarding documentation that should be maintained in student counseling files.

Management Responses: We will formalize and document clear expectations that must be followed by all counselors to support the performance of required counseling activities. These documentation standards will align with the national and state standards. We will communicate these standards to all counselors in our counselors meetings and monitor these requirements during the annual counseling program review on a test basis.

Responsibility: Gladys Pedraza-Burgos, Chief Youth Development and Family Services; Dr. Bonnie Rubenstein, Director of Counseling

Due Date: October 31, 2010



Student Counseling Observations, Recommendations and Action Plans

OBSERVATION #5

Student Interaction

_____—We were unable to obtain assurance that all students were receiving counseling services. Some Counselors performed manual monitoring procedures to ensure that student interaction had occurred; others tracked student contact in a very informal manner _____

_____—A designated level of attention should be established at each grade level, not just for seniors. There should be established monitoring procedures to ensure all students are reviewed at each grade level.

RECOMMENDATIONS and MANAGEMENT RESPONSES

Establish and communicate formal monitoring procedures that will identify how all students should be monitored which will include monitoring frequency and escalation procedures for intervention.

Management Responses: A counseling calendar has been provided to all counselors and is included on the Counseling Sharepoint site. We will also establish specific expectations for counselors to ensure that annual student contact, monitoring and escalation procedures occur.

Responsibility: Gladys Pedraza-Burgos, Chief Youth Development and Family Services; Dr. Bonnie Rubenstein, Director of Counseling

Due Date: October 31, 2010



Student Counseling Observations, Recommendations and Action Plans

OBSERVATION #6

Services Collaboration

Formalized collaboration among the various service oriented disciplines (i.e. counselors, psychologists, social workers, external agencies) does not exist. There are many school support personnel and organizations available to assist with student needs. Common problems likely exist across schools and among grade levels. While it was communicated that some collaboration can occur if a specific student need arises, there was no standard forum to collaborate in a more holistic manner across schools and disciplines. In order to be proactive in dealing with common and emerging student issues, there should be ongoing communication within and among various service individuals.

RECOMMENDATIONS and MANAGEMENT RESPONSES

Consider establishing a cross-functional team to discuss and identify, communicate and remediate common and emerging issues for students. Remediation should include a plan for implementation at schools including delegated responsibility.

Management Responses: We are taking the initiative to engage and participate in the District's RTI teams, Social Workers Advisory Council, the Student Support Center teams and the Counselor Advisory Council as well. The goal is to facilitate open communications, referrals and collaborative efforts to better serve students and their families. Specific communication guidelines will be included in the revised counseling and social workers manual.

Responsibility: Gladys Pedraza-Burgos, Chief of Youth Development and Family Services

Due Date: November 30, 2010



Student Counseling Observations, Recommendations and Action Plans

OBSERVATION #7

Parent/Third-Party Collaboration

The parent communication and collaboration process for counseling related services lacked structure and standards across the District. Parents receive communication through phone calls, letters, home visits, or meetings. The type and volume of the communication varies by school. We were unable to identify District Counseling standards that establish basic protocols for interaction with parents. There were no standardized events that would automatically lead to parent contact by the Counselor. Counseling guidance was also lacking to establish when other District resources should be engaged. Documented guidelines that clearly define responsibility and timing for communicating parent and/or other district resource involvement.

RECOMMENDATIONS and MANAGEMENT RESPONSES

Establish and communicate guidelines to facilitate what types of events should initiate parent contact or additional human service resources. Designate responsibility for coordinating communicating to resources on a timely basis.

Management Responses: All counselors have received the College Boards "College Counseling Sourcebook" which includes parental guidelines by grade level. Specific communication guidelines will be included in the revised counseling manual. We have also included on the RCSD website counseling protocols in the parent section to increase parent awareness. A series of workshops for parents through Parent University will be offered which includes college readiness and financial aid.

Responsibility: Gladys Pedraza-Burgos, Chief Youth Development and Family Services; Dr. Bonnie Rubenstein, Director of Counseling; Dorothy Evans-Flaherty, Director of Parent Engagement

Due Date: October 31, 2010 – Spring 2011



Student Counseling Observations, Recommendations and Action Plans

OBSERVATION #8

Academic Reporting

Standard administrative reporting does not exist to facilitate academic monitoring for all students. Of the schools we visited, we noted that all schools had a method of communicating progress towards graduation for seniors, although the format and content varied. Datacation is a tool available to facilitate student progress tracking, however all schools did not rely on this resource. Schools used either Datacation or Chancery for progress monitoring; however, reporting is performed in an ad hoc basis.

Formal active monitoring did not consistently occur for non-seniors. The documentation varied based on the Counselor's preferences and abilities. Since information should be monitored to track all students at each grade level, standard common reporting would facilitate this task. This will ensure that all Counselors and Principals are able to view relevant information to actively monitor student progress. Improved reporting can assist administrators in making timely decisions regarding student academic intervention.

RECOMMENDATIONS and MANAGEMENT RESPONSES

Implement standard system reports which provide administrators with the key academic drivers for each grade level.

Management Responses: We will identify, establish and communicate standard system reports that all counselors should use to monitor student progress in schools. These sample reports will be communicated to Principals to facilitate their monitoring of students.

Responsibility: Gladys Pedraza-Burgos, Chief Youth Development and Family Services; Dr. Bonnie Rubenstein, Director of Counseling

Due Date: June 30, 2011



Student Counseling Observations, Recommendations and Action Plans

OBSERVATION #9

Counseling for Personal/Social Milestones

Counselors are responsible for addressing personal/social, career and academic attributes for students. The Director of Counseling has provided Counselors with reference information and activities to facilitate teaching these attributes; however, there is no requirement that these activities be performed. As a result, there is inconsistent training and social competencies provided to students.

Counselors noted that students in 7th and 9th grade levels have a significant need for social and personal support when students transitioned, especially from the other district schools. This reactive approach takes a tremendous amount of time, when a more focused emphasis on academics should occur. This challenge is further complicated by a lack of formal social/personal milestones taught to students at the elementary level to facilitate the transition to secondary school. Specific grade relevant milestones and district-wide standards have not been established. If standard personal/social developmental milestones were formally taught and reinforced by grade level, students would be operating with similar competencies regardless of which school they attended. If personal/social milestones are not achieved, it creates a barrier for student success in the academic and career areas.

RECOMMENDATIONS and MANAGEMENT RESPONSES

Implement district-wide personal/social developmental skills that will be taught to students at each specific grade level. Utilize Social Workers to facilitate identification of milestones and teaching developmental skills training due to their expertise in this area.

Management Responses: Since the District does not have elementary counselors, social workers will be provided with New York State School counselors Association, NYSSCA activity books which represent best practices in counseling. The Director of Counseling will work with the Director of Social Work in making these materials available. In addition, the Director of Social Work will work with District Social Work leaders to identify specific training that should be targeted on a District-wide basis.

Responsibility: Gladys Pedraza-Burgos, Chief Youth Development and Family Services; Dr. Bonnie Rubenstein, Director of Counseling; Audrey Cummings, Director of Social Work **Due Date:** June 30, 2011



Student Counseling Observations, Recommendations and Action Plans

OBSERVATION #10

Urban Professional Development

While some Urban Professional Development has been provided, Counselors expressed a need to obtain targeted Urban Professional Development which includes peers from other districts. Funding for targeted training has not been readily available for Counselors. Our discussions with Counselors identified concerns regarding a lack of professional development for urban children. Professional Development is an opportunity for sharing best practices and resources. Counselors in urban districts face unique challenges which require different approaches for success. Counselors communicated that training was offered within the past year, however many Counselors believed the training provided was not relevant for an urban population. Since funding for Professional Development opportunities are limited, Counselor feedback should be considered to ensure relevant concerns are addressed. Considering budgetary limitations, effective Counselors within the district should share best practices amongst their peers to capitalize on effective strategies.

RECOMMENDATIONS and MANAGEMENT RESPONSES

Consider establishing a process that obtains counselor input for Professional Development. At a minimum, provide Urban Professional Development for Counselors.

Management Responses: The Director of Counseling will work with the College Board, the National Office of School Counseling Advocacy (NOSCA), RCSD Professional development and other peers to identify possible training to increase the cultural competency development of school counselors.

Responsibility: Gladys Pedraza-Burgos, Chief Youth Development and Family Services; Dr. Bonnie Rubenstein, Director of Counseling

Due Date: June 30, 2011



Student Counseling Observations, Recommendations and Action Plans

OBSERVATION #11

Counselor Performance Criteria

Counselors are evaluated utilizing the same performance criteria as teachers. A standard evaluation form has been established for teachers, but it is also utilized for school counselors. Required counseling elements are neither identified nor assessed in the annual performance review. Performance evaluations are meant to provide relevant feedback for the individual reviewed; however, the relevant criteria are not included. At a minimum, providing emphasis on counseling criteria would reinforce counselor expectations to the reviewer and counselor. There would also be additional value if an individual with a counseling background performed the review.

RECOMMENDATIONS and MANAGEMENT RESPONSES

Establish and implement an evaluation form that identifies counseling criteria. Consider including the Director of Counseling present in assessing Counselor performance and providing evaluation feedback.

Management Responses: New York State School Counselors Association, NYSSCA and National American School Counselor Association, NASCA has provided an evaluation tool for counselors. We will meet with union representatives to obtain agreement.

Responsibility: Gladys Pedraza-Burgos, Chief Youth Development and Family Services; Dr. Bonnie Rubenstein, Director of Counseling

Due Date: June 30, 2011