



Internal Audit

School Based Counseling Services Audit

School Based Counseling Services Audit

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Date: May 20, 2026

To: Board of Trustees
Stephanie S. Elizalde, Ed.D., Superintendent

From: Robert Rubel, MBA, CPA, CIA, CISA
Chief Internal Audit Officer

Subject: School Based Counseling Services Audit

Executive Summary

The Dallas Independent School District (District) Office of Internal Audit (OIA) has completed the School Based Counseling Services Audit.

The audit focused on the effectiveness and efficiency of processes and procedures surrounding school based counseling services in promoting student success, supporting students' academic needs, and fostering mental health and well-being. Robust counseling programs are critical to the long-term success of the District's students as they comprehensively support the academic, personal, social, and career development of students throughout their journey from elementary to high school.

Overall, the Counseling Services (CS) department within School Leadership has processes in place to manage school based counseling services in accordance with regulations and District policies.

Opportunities for improvement were identified in the following areas:

Observation	Priority	Recommendation
1	Medium	Maximize counselor time spent supporting students by optimizing counselor duties and incorporating efficiencies and more effective reporting within the timekeeping system.
2	Medium	Optimize systems and processes to gain efficiencies, boost student success, and improve compliance with District policies.
3	Medium	Standardize and automate the parental consent process to achieve efficiencies and ease compliance with State regulations.

Implementation of the recommendations in this report would assist counselors to more efficiently and effectively serve students. It would also allow staff to have a greater focus on the more strategic and value-added aspects of counseling and program management.

Background

Department Overview

Following The Texas Model for Comprehensive School Counseling Programs (The Texas Model), the District's school counselors work collaboratively with students, parents, staff, and community members to create a supportive environment where every student can thrive and achieve their full potential. School counselors also leverage the power of the District's resources, including Mental Health Services (MHS), Multi-Tiered Systems of Support (MTSS), Special Education (SPED), and Student Engagement & Support (SES), to boost student success.

CS consists of eight full-time employees, including one Director, one Project Manager, and six Counseling Coordinators, who support the District's 391 counselors (counselor headcount is as of December 10, 2025). At each campus, counselors ultimately report to the Principal's office, which is responsible for hiring, supervising, and assessing the performance of counselors.

The Texas Model

Overview. The Texas Education Agency (TEA) published The Texas Model to assist counselors with (i) holistically analyzing campus-specific data to identify the unique needs of students and (ii) designing a comprehensive program aligned with Texas laws that will meet those needs. The District's counselors adhere to the foundational framework within The Texas Model by collaborating with their principals at the start of the school year to create the Counselor-Principal Conference Form (CPC Form), a data-driven planning tool which outlines the vision, mission, goals, and priorities of the school's counseling program. To develop the CPC Form's components, counselors incorporate feedback from students, teachers, parents and the Guidance Advisory Committee (GAC) via needs assessments to identify potential target areas and gaps.

Program Delivery. The District's counselors meet student needs using the delivery components outlined in The Texas Model as follows:

- Guidance Curriculum
- Individual Planning
- Responsive Services
- System Support

To ensure counselors spend their time on comprehensive school counseling duties, Texas Administrative Code Section 61.1073 and Texas Education Code Section 33.006 (collectively, 80/20) require:

- Counselors to report total time worked during the school year broken out by the four delivery system components as well as other duties using a standardized tracking tool
- Counselors to spend at least 80% of total work time on the four delivery system components
- An annual assessment that includes the number of school counselors in compliance and those not in compliance

Historically, counselors tracked their time using a Google spreadsheet, which CS personnel would manually review and consolidate to comply with 80/20. CS is currently implementing a solution using PowerSchool (PS). OIA is supporting the development of this solution through an advisory project.

Supporting Students

At the beginning of the school year, counselors provide orientation training, including contact information, to staff, students, and parents. Throughout the school year, counselors remain highly visible and involved on campus by attending parent Coffee with the Principal events and meeting with students both individually and collectively in a wide variety of settings.

Counselors support students directly via guidance lessons, individual planning, small group counseling, and responsive services. To identify at-risk students, counselors review attendance records and academic progress in PS. They then meet individually with the student to develop a plan for academic success. The counselors also participate in many school committees, including Leadership Team and Student Support Team, which discuss individual students with specific needs (e.g. academic, social/emotional, mental health) and ensure relevant services are provided. Parents, students, and teachers are also able to reach out directly to the counselor to discuss any concerns. After an individual counseling session, counselors log entries in PS, SchoolLinks (SLI), Google applications, or a notebook.

In consultation with the parents, counselors may refer students for other services, such as MHS. Referrals are input using MHS' online platform. Counselors follow up with MHS, students, and parents to ensure services are being provided and that they are effective.

School Counselor Excellence Instrument

During the 2025-2026 school year, the District launched the School Counselor Excellence Instrument (SCEI), a comprehensive framework outlining best practices, performance standards, and growth pathways for school counselors. The ultimate goal of SCEI is to advance student achievement by ensuring every student receives the support they need when they need it. Aligned with The Texas Model, SCEI is organized around four domains:

- Focus and planning
- Program delivery
- College, career, and military readiness (CCMR)
- Professional responsibilities

As SCEI specifies the requirements to achieve expectations on a graduated basis, Counselors are able to measurably track their performance pursuant to each domain. Campus administrators complete counselor annual performance reviews using the SCEI appraisal process. Counselor effectiveness is assessed based on (i) individual performance in each of the four domains, (ii) stakeholder feedback such as the campus climate and parent surveys, and (iii) student achievement and outcomes. Counselor compensation is tied to the SCEI performance appraisal.

Counselor to Student Ratios

According to The Texas Model, the effectiveness of a comprehensive school counseling program is directly related to its counselor to student ratio. American School Counselor Association (ASCA) recommends a ratio of 1 to 250 and the Texas Counseling Association (TCA) suggests a ratio of 1 to 350. The District is within the TCA ratio on an overall basis, and its high schools are within the ASCA ratio as of December 10, 2025.

State Regulations

In addition to 80/20, the District must comply with a large number of regulations regarding counseling. The following table summarizes a selection of the regulations tested and how the District complies:

Requirement	How District Complies
Guidance lessons focused on intrapersonal effectiveness, interpersonal effectiveness, post-secondary planning/career readiness, and personal health/safety	Guidance lessons delivered to students in classroom or assembly formats.
Written consent including specific information on program/activities content to be kept as part of a student's permanent record	Individual counselors secure consent in various ways, including paper and electronic methods
Counselors must be certified under the rules of the State Board for Educator Certification	Human Capital Management (HCM) monitors certifications monthly
Counselor performance must be evaluated annually	HCM monitors compliance using Cornerstone

Scope

The audit period focused on current processes and procedures along with related data for fiscal year 2025-2026. Certain other matters, procedures, and transactions outside that period were reviewed to understand and verify information during the audit period.

Objective

The objective of the audit was to evaluate the effectiveness and efficiency of school based counseling services in promoting student success, supporting students' academic needs, and fostering mental health and well-being.

Methodology

Auditors interviewed key personnel, conducted walkthroughs, and reviewed supporting documents to understand processes and procedures surrounding school based counseling services.

Detailed audit procedures are noted below:

1. Effectiveness of Counseling Services - To assess the effectiveness of counseling services across the District, auditors performed the following:
 - Verified that schools have submitted the District-required planning documentation, including the vision/mission statements and annual goals focused on student achievement. Assessed the planning documentation for measurability, actionability, completeness, and overall quality for a selection of campuses. See Recommendation 2 in this report.
 - Performed site visits at a sample of campuses and:

- Assessed progress towards goal achievement using relevant student outcome data and inquired about achievement to date, including how any gaps are being addressed.
- Reviewed documentation supporting the collaborative process used to incorporate needs assessments and other stakeholder feedback (parents, students, teachers, Guidance Advisory Committee) throughout the school year.
- Reviewed how data is used to continually identify areas to be addressed and measure individual and overall performance.
- Assessed the school's practices to identify, serve, and monitor at-risk students with regards to academic, social, and emotional well-being, including collaboration with other departments such as MHS to boost student success.
- Verified school counselors participated in campus Leadership Team meetings in which attendees utilize data to identify student achievement opportunities and overcome performance gaps.

See Recommendation 2 in this report.

2. Utilization of Counseling Services - To determine if counseling services are well-utilized and accessible to students in need, auditors performed the following:

- Requested CS's annual assessment for the 2024-2025 school year regarding the Texas Education Code (TEC) requirement that school counselors spend at least 80% of their time on duties that are components of a comprehensive school counseling program and tested individual counselor time trackers on a sample basis for compliance.

See Recommendation 1 in this report.

- Analyzed the current ratio of students to counselors at each campus and compared the ratios with those suggested by the ASCA and TCA. Included each school's overall performance grade in the analysis and identified any outliers.

No observations were noted.

- At the sample selection of campuses visited:
 - Verified that the mandatory Orientation to Counseling Program was delivered to students and parents.
 - Interviewed counselors about their comprehensive communication plan to inform students and parents about available counseling services.
 - Verified campus employees received training on the counseling program at the beginning of the year.
 - Inquired about the referral process and assessed the procedures for ensuring that students in need receive services, including collaboration with other departments.
 - For a sample selection of students who were referred for services, verified that parental permission was obtained in advance and that the student received services in a timely manner.

See Recommendation 3 in this report.

3. Regulatory Compliance – To determine if processes are in place to ensure compliance with state regulations, auditors performed the following at a sample selection of campuses visited:

- Verified schools delivered guidance lessons mandated by TEA.

No observations were noted.

- Verified parental permission was obtained in advance for a selection of students who attended small group counseling.
See Recommendation 3 in this report.
 - For a sample of students who received individual counseling, verified that (a) parental permission was obtained in advance and (b) the counselor completed a log entry in the appropriate system.
See Recommendation 3 in this report.
 - At the high school visited, verified on a sample basis that required CCMR activities are documented for the current school year.
No observations were noted.
4. Quality of School Counselors – To determine that only qualified counselors are hired and retained, auditors performed the following:
- Obtained an independent listing from Oracle HCM of all employees currently designated as school counselors and verified that each counselor holds a valid and current certification issued by TEA using the Educator Certification Online System (ECOS). Followed up on any instances of non-compliance or expired credentials.
No observations were noted.
 - Obtained a listing from Oracle HCM of all employees designated as school counselors at the end of the 2024-2025 school year and verified that each counselor received an annual performance evaluation.
No observations were noted.

Primary criteria used for this audit were:

- 1) Texas Administrative Code (TAC) Section 239 Subchapter A, School Counselor Certificate, updated May 2024
- 2) TAC Section 61.1073, Commissioner's Rules Concerning Counseling Public School Students: Annual Assessment of School District Compliance, updated May 2023
- 3) Texas Education Agency (TEA) Fifth Edition of The Texas Model for Comprehensive School Counseling Programs, updated 2018
- 4) TEC Section 33.006, School Counselors: General Duties, updated September 1, 2021
- 5) TEC Section 33.003, Parental Consent, May 30, 1995
- 6) TEC Section 33.007, Counseling Regarding Postsecondary Education, May 16, 2019
- 7) FFEA (Legal) – Counseling and Mental Health Counseling, November 2023
- 8) 2025-2026 School Counselor Excellence Initiative Performance Rubric, updated June 9, 2025
- 9) 2025-2026 SCEI Performance Resources, updated July 2025
- 10) ASCA National Model – A Framework for School Counseling Programs, updated 2025
- 11) ASCA School Counseling Program Assessment, updated 2025

Audit Observations and Recommendations

Observation 1 – Systems and processes used to manage, monitor, and optimize counselor time could be enhanced.

Condition

During our testing of 80/20 for the 2024-2025 school year, we noted the following:

- The majority of judgmentally selected counselors fully completed time trackers for the school year but inconsistencies in completion were noted.
- The majority of judgmentally selected counselors spent at least 80% of their time on comprehensive school counseling duties but inconsistencies in achieving 80/20 for the full school year were noted.
- Because CS was transitioning to a new timekeeping system, they did not complete the 80/20 annual assessment, so it is unclear how many counselors were not in compliance for the year.

During our campus site visits, we noted the following:

- Some counselors appear to handle administrative duties beyond the components of a comprehensive school counseling program.
- Counselors are inconsistently utilizing the new time tracking system because (i) multiple separate entries can be required each day, (ii) it is difficult to identify the most recent entry and determine how many are outstanding, (iii) it is unclear how to edit entries, and (iv) viewing compliance is more difficult as there are no graphs. At present, it is difficult to determine if all counselors have fully completed their time trackers and are in compliance as not all of the functionality has been built into the system yet.

Cause

Counselors may take on additional duties when other staff are on leave or simply to get them completed. Additionally, to comply with TEA continuing education requirements, counselors must attend in-person professional development meetings occasionally away from campus which can involve lengthy commutes. Furthermore, the platform does not have a traditional timekeeping component and this functionality is currently being built by District EdTech staff. To maintain their certification, counselors must complete a certain level of professional development training.

Effect

Handling other duties and utilizing a less efficient timekeeping system might take counselors away from supporting students. Additionally, the District might not be in compliance with 80/20 without knowing it, particularly if counselors are not completing time entries.

Recommendation 1

To maximize counselor time spent supporting students and enhance the efficiency and effectiveness of the timekeeping system, CS should:

- In collaboration with Educational Technology (EdTech), incorporate functionality into the system so both counselors and CS can quickly and easily determine missing time entries and send automated email alerts with follow-up reminders; OIA will continue to support CS in its endeavors to build out the new timekeeping system.
- Utilize graphs so counselors can immediately view 80/20 compliance and assess the allocation of their time.
- Develop reporting and graphics to illustrate both overall District compliance with 80/20 and compliance at the region, school, and individual counselor levels.
- Share reporting of counselors not in compliance with School Leadership using a reasonable and routine cadence.
- In the longer term, compare each counselor's time allocation to the best practice model for each school type.
- In collaboration with HCM, consider offering professional development for two days in the summer.
- Consider rotating the geographic location of CS meetings when it makes sense.

If building out the timekeeping platform is burdensome for CS and counselors, CS should consider other low or no-cost solutions, such as collaborating with EdTech on an Oracle Application Express (APEX) project.

Risk Level for Observation 1: Medium¹

Management Response

Acknowledgement of observation:

- ☒ Agree
☐ Disagree

Management Response:

CS will continue collaborating with EdTech to enhance the time-tracker system to meet state and District guidelines. Recommended improvements include automated alerts for missing entries, dashboard visualizations for 80/20 compliance, and expanded reporting capabilities at the campus and District levels. If this proves not to be a viable option, we will explore other means collaboratively, such as a separate dashboard that will be easily accessible by our counselors and enhance their time-tracking experiences. CS will continue working with campus leadership to reinforce expectations regarding appropriate counselor duties and explore options to minimize non-counseling responsibilities. Additionally, CS will continue to explore professional development locations to accommodate counselor capacity.

Estimated Implementation Date: September 1, 2028

Individuals responsible for implementation: Dr. JoAnn Jackson Powell and Dr. Asmerom

¹ See Attachment 1 for Definition of Risk Level.

Observation 2 – Systems and processes used by CS and counselors could be streamlined and enhanced.

Condition

As part of our review of CS' procedural documentation, we noted that the department's newly developed SCEI collateral, including the Performance Rubric and Performance Resources, specify counselor responsibilities and documentation requirements. These efforts both boost student success and foster compliance with District and State regulations. However, our audit also found inefficiencies and gaps impacting the counselors' ability to perform these duties. During our testing of each school's planning documentation for the 2025-2026 school year, we noted:

- Some campuses did not submit planning documentation to CS.
- Some counselors submitted goals that were not smart.

Additionally, during our campus site visits, we noted:

- A more efficient and systematic method for identifying and monitoring at-risk students in their caseload would benefit counselors, who are currently pulling academic information from the data platform on a student by student basis and manually triangulating it with attendance and other relevant data, such as social/emotional information, from multiple other sources. Counselors would also benefit from the ability to download a file with contact information, including parent email addresses, for all students in their individual caseloads.
- Counselors document student meetings in multiple ways, some of which are not housed in the District's digital data platforms. Academic success conferences are generally handwritten while minute meetings are documented in Google applications. A more systematic method for tracking the volume and timing of student meetings would benefit counselors, as would more flexibility in conducting and delivering minute meetings to maximize their effectiveness.
- Inefficiencies with the current data platform include multiple steps necessary to add a note for a student and difficulties with the schedule.
- To evidence compliance with District and State regulations, large volumes of paperwork, including planning documentation, training collateral, guidance lesson materials, consent forms, and meeting agendas, are maintained.

Cause

The CPC Form is redundant with the planning input counselors must complete in Cornerstone; this redundancy impacts the principals as well as they must approve both submissions, which are extensive.

Additionally, the District's siloed departmental structure contributes to the fragmentation of both student and compliance monitoring data across multiple platforms. Furthermore, technology that could improve cumbersome processes and boost outcomes has not been fully built or introduced to the workforce.

Effect

If counselors do not fully complete the planning process, the school's counseling program may lack the foundational framework necessary to set up the program for future success.

Not having easy access to all relevant information can cause counselors to experience inefficiencies in supporting students. The information presented in the Reporting and Analytics section of the data platform, such as the volume of counselor meetings a student has had, may also be inaccurate as not all meetings are being captured digitally and all relevant information may not follow the student to the next District school. Maintaining significant amounts of data in paper form is inefficient for the counselors and can hinder the compliance monitoring efforts of the principals and CS.

Recommendation 2

To boost counselors' ability to more effectively and efficiently serve students while supporting compliance efforts, CS should explore:

- Collaboration with HCM and EdTech to eliminate the redundancy between the CPC Form and Cornerstone; this could involve an application program interface to ensure CS and HCM have the ability to monitor completion of planning documentation; the selected solution should incorporate features that force goals to be smart.
- Introduction and training for the counselors on PS Analytics and Insights, a newly-implemented module which has the ability to digitally triangulate relevant student information across multiple platforms while still maintaining privacy; CS should also re-train counselors on PS reporting and My Data Portal as the library of reports is extensive and includes parent contact information as an example.
- Re-training counselors on the appropriate repositories for counselor log entries; in the longer term, CS should consider transitioning the minute meetings from Google to the data platform and work with EdTech to build functionality that enables both CS and counselors to track student meetings in the data platform.
- Collaboration with the current data platform to explore options to streamline student note and schedule input.
- Re-training counselors on existing digital solutions to house compliance-related documentation; in the longer term, CS should consider development of one central platform to digitally store and track compliance-related documentation such as APEX, which can house digital files and streamline compliance monitoring for CS and principals by illustrating status in reporting and dashboard formats.

Risk Level for Observation 2: Medium²

Management Response

Acknowledgement of observation:

- ☒ Agree
☐ Disagree

Management Response:

Counseling Services will update the Annual Administrative Conference (AAC) form to reduce duplicating efforts with Cornerstone documentation. CS will collaborate with EdTech to develop documentation, reporting and management tools to support counselor effectiveness. CS will also

² See Attachment 1 for Definition of Risk Level.

explore the transition of additional documentation processes into centralized digital platforms and work with School Leadership to streamline student note entry and scheduling functions.

Estimated Implementation Date: September 1, 2028

Individuals responsible for implementation: Dr. JoAnn Jackson Powell and Dr. Asmerom

Observation 3 – The parental consent process would benefit from standardization and automation and the District could focus on boosting parental engagement.

Condition

During our campus site visits, we noted:

- Different methods are currently being utilized to obtain parental consent, including paper forms physically signed by parents. Many counselors are utilizing the digital consent form the District implemented at the beginning of the school year in response to Texas Senate Bill 12 (SB12). This form does not include specific information on the content of the counseling program and types of activities in which the students will be involved as required by TEC Section 33.004. We understand the digital SB12 form for the next school year will address the TEC requirements.
- Some schools have noticed a decline in parental involvement, with lower attendance counts at orientation meetings and Coffee with Principal events.

Cause

SB12 was introduced with little guidance which caused confusion amongst school districts across Texas, including counseling staff. Additionally, the current political climate might be keeping some parents from visiting campuses.

Effect

Utilizing multiple types of parental consent forms reduces efficiency and increases the risk of noncompliance with TEC regulations. Utilizing paper forms increases the filing burden on counselors.

Recommendation 3

To achieve efficiencies and ease compliance with State regulations, CS should incorporate standard parental consent language that addresses all activities covered under TEC 33.004, such as small group and individual counseling. The form should be a required activity for completion within the on-line registration so counselors can easily determine if parental consent has been received prior to providing services. CS should then train counselors on the enhanced process.

Additionally, to boost parental engagement, CS should continue to train counselors on best practices to involve parents who cannot physically visit the campus. This could involve uploading orientation materials in both English and Spanish to the school's website. The materials should include contact information as well as a QR code linking to the online appointment request form. They should also offer parents the ability to meet virtually for both individual discussions as well as for broader presentations of the counseling program orientation.

Risk Level for Observation 3: Medium³

Management Response

Acknowledgement of observation:

- ☒ Agree
☐ Disagree

Management Response:

Counseling Services will continue to work with the appropriate departments to implement a revised districtwide digital consent form aligned with TEC requirements and integrated into the registration systems. We will collaborate with Mental Health Services to streamline processes. CS will continue exploring opportunities to expand parental engagement to support families, utilizing multiple District platforms.

Estimated Implementation Date: June 1, 2027

Individuals responsible for implementation: Dr. Jackson Powell and Dr. Asmerom

Conclusion

On a daily basis, counselors ensure that District students thrive academically, socially, and emotionally. As such, counselors are integral to every school's mission and are a key driver of long-term success for students. In an age of resource constraints, it is critical that the District's departments take a strategic approach to optimize and leverage its programs to boost cost effective solutions for students and District employees. To ultimately succeed, this strategic approach must be supported by robust processes and systems to improve efficiency, functionality, and the user experience.

Overall, processes are in place to manage Counseling Services. Implementation of the recommendations in this report would boost the success of the department's programs while improving the efficiency and effectiveness of its processes.

We would like to thank Counseling Services, Human Capital Management, and Education Technology for their cooperation and assistance with this audit.

The audit was conducted in conformance with the Institute of Internal Auditors' *Global Internal Audit Standards*. Those standards require OIA to plan and perform the audit to obtain sufficient, reliable, and relevant evidence to provide a reasonable basis for our observations and conclusions based on our audit objectives. OIA believes the evidence obtained provides a reasonable basis for our observations and conclusions based on our audit objectives.

³ See Attachment 1 for Definition of Risk Level.

Respectfully submitted,

Robert Rubel

Robert Rubel, MBA, CPA, CIA, CISA
Chief Internal Audit Officer

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Definition of Risk Level

Risk Level	Definition
High	These risks could directly impact the achievement of critical strategic or operational objectives of the District. There is a high likelihood of occurrence, and if the event materializes, it could result in a significant negative impact on the District's financial stability, operational efficiency, ability to meet intended outcomes, reputation, or compliance, potentially exceeding the District's risk appetite.
Medium	These risks pose a moderate likelihood of occurrence and could have a notable adverse impact on important operational aspects of the District. While undesirable, the potential financial, reputational, strategic or compliance consequences are less severe than high-level risks and may approach the District's risk appetite.
Low	These risks have a low likelihood of occurrence and are expected to have a minimal impact on the District's operational efficiency, financial standing, reputation, or compliance. These risks are generally within the District's risk appetite but still warrant monitoring and may require basic controls.

Management Response

Observation 1 – Systems and processes used to manage, monitor, and optimize counselor time could be enhanced.

Acknowledgement of observation:

- ☒ Agree
☐ Disagree

Management Response:

CS will continue collaborating with EdTech to enhance the time-tracker system to meet state and District guidelines. Recommended improvements include automated alerts for missing entries, dashboard visualizations for 80/20 compliance, and expanded reporting capabilities at the campus and District levels. If this proves not to be a viable option, we will explore other means collaboratively, such as a separate dashboard that will be easily accessible by our counselors and enhance their time-tracking experiences. CS will continue working with campus leadership to reinforce expectations regarding appropriate counselor duties and explore options to minimize non-counseling responsibilities. Additionally, CS will continue to explore professional development locations to accommodate counselor capacity.

Estimated Implementation Date: September 1, 2028

Individuals responsible for implementation: Dr. Jackson Powell and Dr. Asmerom

Observation 2 – Systems and processes used by CS and counselors could be streamlined and enhanced.

Acknowledgement of observation:

- ☒ Agree
☐ Disagree

Management Response: Counseling Services will update the Annual Administrative Conference (AAC) form to reduce duplicating efforts with Cornerstone documentation. CS will collaborate with EdTech to develop documentation, reporting and management tools to support counselor effectiveness. CS will also explore the transition of additional documentation processes into centralized digital platforms and work with School Leadership to streamline student note entry and scheduling functions.

Estimated Implementation Date: September 1, 2028

Individuals responsible for implementation: Dr. Jackson Powell and Dr. Asmerom

Observation 3 – The parental consent process would benefit from standardization and automation and the District could focus on boosting parental engagement.

Acknowledgement of observation:

- ☒ Agree
- ☐ Disagree

Management Response:

Counseling Services will continue to work with the appropriate departments to implement a revised districtwide digital consent form aligned with TEC requirements and integrated into the registration systems. We will collaborate with Mental Health Services to streamline processes. CS will continue exploring opportunities to expand parental engagement to support families, utilizing multiple District platforms.

Estimated Implementation Date: June 1, 2027

Individuals responsible for implementation: Dr. Jackson Powell and Dr. Asmerom

Criteria by Observation

Observation 1 – Criteria

TAC Section 61.1073, Commissioner's Rules Concerning Counseling Public School Students: Annual Assessment of School District Compliance, updated May 2023

(b) School districts shall require each district school counselor to track and document, using a standardized tracking tool, as established by each district, the time spent on work duties performed by the school counselor throughout a school year. This tracking tool shall:

(1) include the following components

(A) the total work time worked by the school counselor for the year;

(B) the total time spent on the following duties that are components of a counseling program developed under TEC, § 33.005:

- (i) provision of a guidance curriculum;
- (ii) responsive services for students;
- (iii) individual planning for students; and
- (iv) system support; and

(C) the total time spent on duties that are not components of a counseling program developed under TEC, § 33.005, including time spent in administering assessment instruments or providing other assistance in connection with assessment instruments (except time spent in interpreting data from assessment instruments); and

(2) be maintained by the district in a format that can be made available to Texas Education Agency (TEA) upon request.

(c) School districts shall annually assess the district's compliance with the policy adopted under TEC, § 33.006(d). The assessment shall include:

(1) work time tracking documentation as described in subsection (b) of this section for each school counselor in the district;

(2) the number of school counselors whose work was in compliance with the district policy adopted under TEC, § 33.006(d); and

(3) the number of school counselors in the district whose work was not in compliance with the district policy adopted under TEC, § 33.006(d).

TEC Section 33.006, School Counselors: General Duties, updated September 1, 2021

(d) Except as provided by Subsection (e), the board of trustees of each school district shall adopt a policy that requires a school counselor to spend at least 80 percent of the school counselor's total work time on duties that are components of a counseling program developed under Section 33.005. For purposes of this subsection, time spent in administering assessment instruments or providing other assistance in connection with assessment instruments, except time spent in interpreting data from assessment instruments, is not considered time spent on counseling. Each school in the district shall implement the policy. A copy of the policy shall be maintained in the

office of each school in the district and made available on request during regular school hours to district employees, parents of district students, and the public.

Observation 2 – Criteria

Texas Education Agency (TEA) Fifth Edition of The Texas Model for Comprehensive School Counseling Programs, updated 2018

Section III: Foundational Components: It is imperative that specific foundational components are constructed and realized in the development of the comprehensive school counseling program. These foundational components are the heart of the school counseling program. The foundational components include creating school counseling program mission statements, defining the campus-based school counseling program, outlining the rationale for the campus school counseling program, identifying assumptions for the school counseling program at the local level, establishing goals for the campus school counseling program, designing school counseling program priorities, and evaluating overall school counseling program effectiveness.

Program Goals: Development of relevant school counseling program goals assures that school counselors are deliberate in their actions and focused on their mission. A thorough review of available data should guide the school counselor's goal-development activities to pinpoint areas of need. The SMART goal format (Yemm, 2013) is a reliable way for school counselors to create school counseling program goals that will be Specific, Measurable, Achievable, Relevant, and Timebound.

2025-2026 School Counselor Excellence Initiative Performance Rubric, updated June 9, 2025

Domain 1.1 Vision and Mission Statements: Collaboratively develops an evidence-based counseling program vision and mission that paints an actionable picture of success for all students.

Domain 1.2 Annual Student Outcome Goal: Set actionable, responsive goals grounded in qualitative and quantitative data and aligned to the mission and vision of the counseling Program.

Standards for Internal Control in the Federal Government, United States Government Accountability Office, Principle 11 – Design Activities for the Information System, Section 11.03 – Design of the Entity's Information System, September 2014

11.03 Management designs the entity's information system to obtain and process information to meet each operational process's information requirements and to respond to the entity's objectives and risks. An information system is the people, processes, data, and technology that management organizes to obtain, communicate, or dispose of information. An information system represents the life cycle of information used for the entity's operational processes that enables the entity to obtain, store, and process quality information.

TEA's Effective Districts Framework (EDF) Version 1.0, 2024

Key Practice 6.4.4: Non-curricular Software Systems (i.e., LMS, SIS, HR mgmt., etc.) District acquires or develops information systems to support non-curricular actions within the district and each campus that limit extraneous actions from teachers and administrators and maximize learning time for students.

Key Practice 1.4.2: Data Setup District assesses current data systems and increases capacity and systems as needed to meet measurement and monitoring

Key Practice 1.4.3: Data Collection District collects and synthesizes data and information related to progress in executing implementation plan and achieving the district's vision and goals.

Key Practice 3.1.4: Family Engagement District sets expectations and provides staff training and time to meaningfully engage parents/caregivers, promote parent/caregiver understanding of student progress and campus expectations, and facilitate a parent/caregiver partnership to support overall student development and success.

Observation 3 – Criteria

TEC Section 33.003, Parental Consent, May 30, 1995

The board of trustees of each school district shall adopt guidelines to ensure that written consent is obtained from the parent, legal guardian, or person entitled to enroll the student under Section 25.001(j) for the student to participate in those activities for which the district requires parental consent.

TEC Section 33.004, Parental Involvement, June 13, 2023

(a) Each school shall obtain, and keep as part of the student's permanent record, written consent of the parent or legal guardian as required under Section 33.003. The consent form shall include specific information on the content of the program and the types of activities in which the student will be involved. The board of trustees of each school district shall adopt guidelines to ensure that written consent is obtained from the parent, legal guardian, or person entitled to enroll the student under Section 25.001(j) for the student to participate in those activities for which the district requires parental consent.

(b) Each school, before implementing a comprehensive school counseling program under Section 33.005, shall annually conduct a preview of the program for parents and guardians. All materials, including curriculum to be used during the year that is not available digitally through an instructional materials parent portal under Section 31.154, must be available for a parent or guardian to preview during school hours. Materials or curriculum not included in the materials on an instructional materials parent portal or available on the campus for preview may not be used.

FFEA (Legal) – Counseling and Mental Health Counseling, Parental Consent and Review, November 2023

A board shall adopt guidelines to ensure that written consent is obtained from the parent, legal guardian, or other person entitled to enroll the student under Education Code 25.001(j) for the student to participate in those activities for which parental consent is required. *Education Code 33.003*

Each school shall obtain, and keep as part of the student's permanent record, this written consent by the parent or legal guardian. The consent form shall include specific information on the content of the program and the types of activities in which the student will be involved.

Each school, before implementing a comprehensive school counseling program, shall annually conduct a preview of the program for parents and guardians. All materials, including curriculum to be used during the year that is not available digitally through an instructional material parent

portal under Education Code 31.154, must be available for a parent or guardian to preview during school hours. Materials or curriculum not included in the materials on an instructional materials parent portal or available on the campus for preview may not be used. *Education Code 33.004*