

House Bill 2876-1: Coordinated Comprehensive School Counseling Program
House Committee on Rules
May 4, 2019

Dear Chair Holvey and Members of the House Committee on Rules,

The alleged intent in putting forward HB 2876 (formerly 2441-1) regarding comprehensive school counseling programs is for clarity, flexibility, and local control. In contrast to providing clarity, this scope of practice bill muddies the water about the implementation of comprehensive school counseling programs as already directed in the Oregon Framework and Division 22. It also muddies the water about already existing flexibility and local control.

The Oregon Framework for Comprehensive School Counseling Programs (ODE, 2018) is clearly built atop the American School Counseling Association's (ASCA) National Model (2003) as noted on page ii of the Framework and evident throughout the document. Both the ASCA National Model and the Oregon Framework define the scope of practice of school counselors—hence their titles and the phrase “comprehensive *school counseling* programs.” Passage of this bill would severely impinge on the scope of practice of licensed school counselors.

While true that implementing a comprehensive school counseling program is a collaborative effort that incorporates many professionals in K-12 schools, at the center of this effort is a licensed school counselor trained to implement this program. No one else in a K-12 building has comparable training. If Venn diagrams of the various other professionals were drawn there would be some overlap. For example, school counselors provide classroom guidance lessons, but we don't confuse them with classroom teachers. School counselors provide leadership in their buildings, but they ought not be confused with principals. The same is true with school psychologists and school social workers. Their training is significantly different from school counselors. They have their roles to play *in collaboration with* school counselors—not instead of them.

It is also true that in a pinch others can be called on to provide services that are the bailiwick of licensed school counselors as is *already provided for* in both the Oregon Framework and in existing law. However it is also true that a typical and best case scenario would have school counselors, trained and licensed to implement comprehensive school counseling programs, doing that important work. Consider how in an emergency a medical provider may step into the gap and provide services in spite of a lack of training in a specific area of medicine. There too, the typical and best case scenario would have those medical providers, who are trained and licensed to provide a given service, doing that work. In a pinch you can get by, but it matters who is providing services.

In terms of providing flexibility and local control to school districts, *these already exist* within the Oregon Framework and under current law. This bill is based on a false premise—that without this bill school districts without school counselors will assume they're in violation. Current law (Comprehensive School Counseling OAR 581-022-2060) clearly steers school superintendents to ODE's Oregon Framework:

581-022-2060 (2) School Comprehensive Counseling. Each school shall provide a comprehensive counseling program that serves students grades K through 12, **based upon the Oregon Department of Education's Framework for Comprehensive School Counseling** [emphasis added] which: (a) Identifies staff responsibilities to plan, design and deliver a comprehensive

school counseling program that meets the unique needs of their students and community, [and]
 (c) Assigns counseling responsibilities to the appropriate personnel.

Oregon's Framework (ODE, 2018) then clearly states that "the school counseling program is **typically** [emphasis added] organized and implemented by licensed school counselors, and **occasionally** [emphasis added] other professionally trained staff" (p. 3) It goes on with more detail in a section titled "Professional Staff" to lay out the following:

The delivery of a counseling program requires the participation of all school staff to provide comprehensive, integrated services, developmentally appropriate core curriculum, and individual student planning. A team of stakeholders guide the program goals and oversee implementation, documentation and evaluation of the program. The program team is **typically** [emphasis added] facilitated by a licensed school counselor trained in a counselor education program rooted in the ASCA National Model/Oregon's Framework for Comprehensive School Counseling Programs. The core program team may be comprised of licensed counselors as well as school psychologists, school social workers, specialized counseling and career development personnel, and clerical support staff in a large school district. Small, rural district needs might be met with a single individual, a team approach, or contracted services. (p. 21)

The scope of practice of school counselors is clearly defined in the Oregon Framework (ODE, 2018) and the ASCA National Model (ASCA, 2003). The flexibility and local control already afforded school districts in implementing comprehensive school counseling programs when the need arises is already codified in law and is clearly stated in the Oregon Framework. Layering more atop these already existing documents adds confusion and is an onerous impingement on the scope of practice of a longstanding profession, namely school counseling. This, in turn, impinges on the quality of the services provided to Oregon's children via comprehensive school counseling programs.

In light of the above, I strongly urge you to **oppose** House Bill 2876/2441.

Sincerely,



Lorraine DeKruyf, PhD
 Professor of Counseling
 Director, Master's in School Counseling Program
 George Fox University
ldekruyf@georgefox.edu
 503.554.6147

American School Counselor Association. (2003). *The ASCA national model: A framework for school counseling programs*. Alexandria, VA: Author.

Comprehensive School Counseling. (2018) OAR 581-022-2060 (2)(a)(c). Retrieval at <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=252976>

Oregon Department of Education. (2018). *Oregon's framework for comprehensive school counseling programs*. Salem, OR: Author.