

House Bill 2876-2: Coordinated Comprehensive School Counseling Program  
House Committee on Rules  
May 19, 2019

Dear Chair Burdick and Members of the Senate Committee on Rules,

The purpose of this letter is to voice strong opposition to HB 2876-2 regarding coordinated comprehensive school counseling programs. I have 18 years of experience as a school counselor educator in Oregon, preceded by 20 years as a practicing school counselor. As a school counselor educator I have worked with over 150 school counseling candidates and as many licensed school counselors serving as supervisors. Based on these experiences I can assure you that implementing a comprehensive school counseling program so as to best serve Oregon's students calls for rigorous training specific to the demands of this job.

In the helping professions there are many areas of expertise. School counseling has long been one of them, with nationally recognized domains that define the work in relation to other helpers. These can be found in the American School Counseling Association's (ASCA) National Model (2003) and in the Oregon Framework for Comprehensive School Counseling Programs (ODE, 2018). These 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. Developing, implementing, and evaluating comprehensive school counseling programs is one of the defining tasks of the profession, and is an important part of the training to engage in it. For persons wishing to undertake this work there is a profession that already exists: school counseling. There are also two clearly defined training paths already available in Oregon for those wishing to pursue this work: a master's in school counseling program or a licensure-only program available to persons with a master's degree in another mental health field. My colleagues and I have long welcomed persons trained as social workers to apply for the latter at any of our institutions, to round out their training and so equip themselves to do the important work of implementing comprehensive school counseling programs. House Bill 2876-2 implies that this training and its resulting expertise is negligible. This is simply not so.

Implementing a comprehensive school counseling program is a collaborative effort that draws on 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.

Per the Oregon Framework (See pp. 3, 21; ODE, 2018) and Division 22 (OAR 581-022-2060 (2)(a)(c)), school districts currently have the flexibility and local control to hire unlicensed non-school counselors to fill school counseling positions if they cannot be filled otherwise. This “in a pinch” provision is wise; however, having a wide open provision such as HB 2876-2 is not. Much like a medical provider may, in an emergency, provide critical aid in spite of a lack of training in a specific area of medicine, the typical and best case scenario would have a medical provider who is trained and licensed to provide a given service doing that work. This is true for school counseling and implementing comprehensive school

counseling programs as well. The typical and best case scenario would have licensed school counselors who are trained to implement comprehensive school counseling programs serving Oregon's children in this capacity. In a pinch you can get by, but it matters who provides services.

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 2876-2.

Sincerely,



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