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Commissioner of Education

KENTUCKY DEPARTMENT OF EDUCATION

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November 14, 2019

Mr. David Wickersham, Director
Office of Education Accountability
475 Coffee Tree Road
Frankfort, KY 40601

Re: Office of Education Accountability's (OEA) draft report on School Counselor Use of Time

Dear Mr. Wickersham:

Thank you for providing the Kentucky Department of Education (KDE) an opportunity to review OEA's draft report on school counselors' use of time in Kentucky. Given this topic's importance to Kentucky's students, local school districts, and our Commonwealth, KDE is pleased the Interim Joint Committee on Education and OEA are exploring this issue.

KDE has one comment to the report, concerning the following recommendation:

Recommendation 2.2:

The information sent to the Kentucky Department of Education (KDE) by superintendents should include a summary of job duties and work undertaken by each counselor and the approximate percent of time devoted to each duty over the course of the year as required by *KRS 158.4416*. The current survey utilized by KDE does not meet the statutory requirement.

KDE Response:

In 2019, the General Assembly passed Senate Bill 1. KRS provides:

No later than November 1, 2019, and each subsequent year, the local school district superintendent shall report to the department the number and placement of school counselors in the district. The report shall include the source of funding for each position, as well as a summary of the job duties and work undertaken by each counselor and the approximate percent of time devoted to each duty over the course of the year.

This provision does not provide a mechanism for superintendents to complete the required report. As a result, on September 16, 2019, the Kentucky Department of Education created a survey that yielded data that will help superintendents better understand how they are appropriately or inappropriately utilizing their school counselors. A copy of the survey is attached.

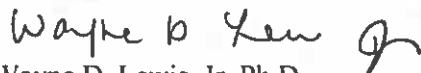
In its report, OEA contends that KDE's survey does not meet the statutory requirement of yielding information on each school counselor's job duties and approximate percent of time devoted to each duty. KDE's survey does, however, collect data regarding the number of counselors hired within each respective district, the ratio of students served by each counselor and the approximate percentage of time school counselors within each district spend on a variety of tasks and responsibilities, including, but not limited to the following:

- Student advising and academic planning;
- Orientation and advising of new students;
- Building the school's master schedule of courses;
- Interpreting cognitive, aptitude and achievement assessments;
- Coordinating schoolwide assessments;
- Counseling for students with attendance and behavior concerns;
- Student crises management;
- Long-term counseling of students for psychological and mental health concerns;
- Collaborating with classroom teachers on lesson planning and delivering lessons;
- Interpreting, analyzing and maintaining student records and data; and
- Advocating for students through stakeholder meetings.

The collection of this data has the potential to improve job duties and job functions for school counselors in the Commonwealth. Furthermore, the data will help KDE better understand the difference between what is asked of elementary, middle and high school counselors and provide guidance and support for superintendents and school districts found throughout our state thereafter. Information on each counselor's duties and time allotted to those duties is not required to achieve these goals.

KDE recognizes, however, that the statute provides the requirement of "a summary of the job duties and work undertaken by *each counselor* and the approximate percent of time devoted to each duty over the course of the year," and KDE's survey does not yield this level of information. This was KDE's first attempt at creating and utilizing an instrument that would yield functional data for superintendents and the agency. While KDE is concerned that it is very onerous for each superintendent to list each school counselor and each job duty for all listed individuals, and that this level of information does not yield more effective data, we will work with the Legislative Research Commission to ensure that we are in compliance with the survey in the future. Furthermore, we will not duplicate data collected in the Professional Staffing Data Report in the future.

Sincerely,



Wayne D. Lewis, Jr. Ph.D.
Commissioner of Education

Certified School Counselor Survey Required by KRS 158.4416

As required by KRS 158.4416 (3)(e) "No later than November 1, 2019, and each subsequent year, the local school district superintendent shall report to the department the number and placement of school counselors in the district. The report shall include the source of funding for each position, as well as a summary of the job duties and work undertaken by each counselor and the approximate percent of time devoted to each duty over the course of the year."

* Required

1. District Name *

2. Total number of certified school counselors in the district? Use decimals if part-time certified school counselors exist. *

3. How many of those certified school counselors are employed full-time for those duties in your district? *

4. How many are in elementary schools? Use decimals if part-time certified school counselors exist. *

5. How many are in middle schools? Use decimals if part-time certified school counselors exist. *

6. How many are in high schools? Use decimals if part-time certified school counselors exist. *

7. List the schools in your district served by a certified school counselor and how many certified school counselors serve each of those schools. *

8. What is your certified school counselor to student ratio in the district? *

Funding Source for Certified School Counselors

For each funding source indicate how many certified school counselors are paid through those funds.

9. SEEK Allocation *

10. Community Partnership *

11. Center for School Safety Funds *

12. Title IV Part A *

13. Other *

14. If you entered any number above zero for Other or for Community Partnership, enter additional information about these funds and the source here.

Typical Job Duties - Elementary

Enter the approximate percentage of time that your school counselors are spending on each of the listed activities over the course of the school year. This section does not have to equal 100 percent as other duties may exist. It, however, cannot exceed 100 percent. These are typical activities for school counselors according to the American School Counseling Association (2019).

15. **Advisement and appraisal for academic planning ***
-
16. **Orientation, coordination and academic advising for new students ***
-
17. **Interpreting cognitive, aptitude and achievement tests ***
-
18. **Providing counseling to students who are tardy or absent ***
-
19. **Providing counseling to students who have disciplinary problems ***
-
20. **Providing short-term individual and small-group counseling services to students ***
-
21. **Consulting with teachers to schedule and present school counseling curriculum lessons based on developmental needs and needs identified through data ***
-
22. **Interpreting student records ***
-
23. **Analyzing grade-point averages in relationship to achievement ***
-
24. **Consulting with teachers about building classroom connections, effective classroom management and the role of non-cognitive factors in student success ***
-
25. **Protecting student records and information per state and federal regulations ***
-

26. **Consulting with the school principal to identify and resolve student issues, needs and problems ***

27. **Advocating for students at individual education plan meetings, student study teams and school attendance review boards, as necessary ***

28. **Analyzing disaggregated school-wide and school counseling program data ***

Atypical Activities - Elementary

Enter the approximate percentage of time that your school counselors are spending on each of the listed activities over the course of the school year. This section should not equal 100 percent as the previous section included activities which require counselor time. The combination of the two sections, should equal to 100 percent. These are atypical activities for school counselors according to the American School Counseling Association (2019).

29. **Building the master schedule ***

30. **Coordinating paperwork and data entry of all new students ***

31. **Coordinating cognitive, aptitude and achievement testing programs ***

32. **Signing excuses for students who are tardy or absent ***

33. **Performing disciplinary actions or assigning discipline consequences ***

34. **Providing long-term counseling in schools to address psychological disorders ***

35. **Covering classes when teachers are absent or to create teacher planning time ***

36. **Maintaining student records ***

37. **Computing grade-point averages ***

38. **Supervising classrooms or common areas ***

39. **Keeping clerical records ***

40. **Assisting with duties in the principal's office ***

41. **Coordinating school-wide individual education plans, student study teams, response to intervention plans, MTSS and school attendance review boards ***

42. **Serving as a data entry clerk ***

43. **Other Duties ***

44. **If any time was placed under other duties, please describe those duties here.**

Typical Job Duties - Middle School

Enter the approximate percentage of time that your school counselors are spending on each of the listed activities over the course of the school year. This section does not have to equal 100 percent as other duties may exist. It, however, cannot exceed 100 percent. These are typical activities for school counselors according to the American School Counseling Association (2019).

45. Advisement and appraisal for academic planning *

46. Orientation, coordination and academic advising for new students *

47. Interpreting cognitive, aptitude and achievement tests *

48. Providing counseling to students who are tardy or absent *

49. Providing counseling to students who have disciplinary problems *

50. Providing short-term individual and small-group counseling services to students *

51. Consulting with teachers to schedule and present school counseling curriculum lessons based on developmental needs and needs identified through data *

52. Interpreting student records *

53. Analyzing grade-point averages in relationship to achievement *

54. Consulting with teachers about building classroom connections, effective classroom management and the role of non-cognitive factors in student success *

55. Protecting student records and information per state and federal regulations *

56. **Consulting with the school principal to identify and resolve student issues, needs and problems ***

57. **Advocating for students at individual education plan meetings, student study teams and school attendance review boards, as necessary ***

58. **Analyzing disaggregated school-wide and school counseling program data ***

Atypical Activities - Middle School

Enter the approximate percentage of time that your school counselors are spending on each of the listed activities over the course of the school year. This section should not equal 100 percent as the previous section included activities which require counselor time. The combination of the two sections, should equal to 100 percent.

These are atypical activities for school counselors according to the American School Counseling Association (2019).

59. **Building the master schedule ***

60. **Coordinating paperwork and data entry of all new students ***

61. **Coordinating cognitive, aptitude and achievement testing programs ***

62. **Signing excuses for students who are tardy or absent ***

63. **Performing disciplinary actions or assigning discipline consequences ***

64. **Providing long-term counseling in schools to address psychological disorders ***

65. **Covering classes when teachers are absent or to create teacher planning time ***

66. **Maintaining student records ***

67. **Computing grade-point averages ***

68. **Supervising classrooms or common areas ***

69. **Keeping clerical records ***

70. **Assisting with duties in the principal's office ***

71. **Coordinating school-wide individual education plans, student study teams, response to intervention plans, MTSS and school attendance review boards ***

72. **Serving as a data entry clerk ***

73. **Other Duties ***

74. **If any time was placed under other duties, please describe those duties here.**

Typical Job Duties - High School

Enter the approximate percentage of time that your school counselors are spending on each of the listed activities over the course of the school year. This section does not have to equal 100 percent as other duties may exist. It, however, cannot exceed 100 percent. These are typical activities for school counselors according to the American School Counseling Association (2019).

75. Advisement and appraisal for academic planning *

76. Orientation, coordination and academic advising for new students *

77. Interpreting cognitive, aptitude and achievement tests *

78. Providing counseling to students who are tardy or absent *

79. Providing counseling to students who have disciplinary problems *

80. Providing short-term individual and small-group counseling services to students *

81. Consulting with teachers to schedule and present school counseling curriculum lessons based on developmental needs and needs identified through data *

82. Interpreting student records *

83. Analyzing grade-point averages in relationship to achievement *

84. Consulting with teachers about building classroom connections, effective classroom management and the role of non-cognitive factors in student success *

85. Protecting student records and information per state and federal regulations *

86. **Consulting with the school principal to identify and resolve student issues, needs and problems ***

87. **Advocating for students at individual education plan meetings, student study teams and school attendance review boards, as necessary ***

88. **Analyzing disaggregated school-wide and school counseling program data ***

Atypical Activities - High School

Enter the approximate percentage of time that your school counselors are spending on each of the listed activities over the course of the school year. This section should not equal 100 percent as the previous section included activities which require counselor time. The combination of the two sections, should equal to 100 percent. These are atypical activities for school counselors according to the American School Counseling Association (2019).

89. **Building the master schedule ***

90. **Coordinating paperwork and data entry of all new students ***

91. **Coordinating cognitive, aptitude and achievement testing programs ***

92. **Signing excuses for students who are tardy or absent ***

93. **Performing disciplinary actions or assigning discipline consequences ***

94. **Providing long-term counseling in schools to address psychological disorders ***

95. **Covering classes when teachers are absent or to create teacher planning time ***

96. **Maintaining student records ***

97. **Computing grade-point averages ***

98. **Supervising classrooms or common areas ***

99. **Keeping clerical records ***

100. **Assisting with duties in the principal's office ***

101. **Coordinating school-wide individual education plans, student study teams, response to intervention plans, MTSS and school attendance review boards ***

102. **Serving as a data entry clerk ***

103. **Other Duties ***

104. **If any time was placed under other duties, please describe those duties here.**
