

**WEST VIRGINIA
SECRETARY OF STATE**

JOE MANCHIN, III

ADMINISTRATIVE LAW DIVISION

Form #5

Do Not Mark In This Box

FILED

DEC 15 P 4: 56

WEST VIRGINIA
SECRETARY OF STATE

**NOTICE OF AGENCY ADOPTION OF A PROCEDURAL OR INTERPRETIVE RULE
OR A LEGISLATIVE RULE EXEMPT FROM LEGISLATIVE REVIEW**

AGENCY: West Virginia Board of Education TITLE NUMBER: 126

CITE AUTHORITY: W.Va. Constitution, Article XII, §2, W.Va. Code §18-2-5 and §18-5-18b

RULE TYPE: PROCEDURAL _____ INTERPRETIVE _____

EXEMPT LEGISLATIVE RULE X

CITE STATUTE(S) GRANTING EXEMPTION FROM LEGISLATIVE REVIEW
W.Va. Code §§ 29A-3B-1, et seq.; W.Va. Board of Education
v. Hechler, 180 W.Va. 451; 376 S.E.2d 839 (1988).

AMENDMENT TO AN EXISTING RULE: YES X NO _____

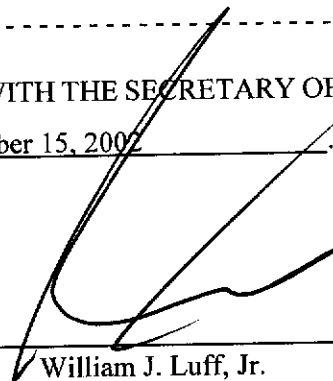
IF YES, SERIES NUMBER OF RULE BEING AMENDED: 67

TITLE OF RULE BEING AMENDED: Comprehensive Developmental Guidance and
Counseling (2315)

IF NO, SERIES NUMBER OF NEW RULE BEING PROPOSED: _____

TITLE OF RULE BEING PROPOSED: _____

THE ABOVE RULE IS HEREBY ADOPTED AND FILED WITH THE SECRETARY OF STATE. THE
EFFECTIVE DATE OF THIS RULE IS December 15, 2002.



William J. Luff, Jr.
Deputy State Superintendent of Schools

SCANNED

**EXECUTIVE SUMMARY
WEST VIRGINIA BOARD OF EDUCATION**

POLICY NUMBER AND TITLE: POLICY 2315
COMPREHENSIVE DEVELOPMENTAL GUIDANCE
AND COUNSELING

PUBLIC COMMENT PERIOD ENDS: October 18, 2002

ADOPTED:

BACKGROUND:

In response to changes in W. Va. Code §18-5-18b, West Virginia Board of Education Policy 2315 has been revised to define the role of the school counselor by defining components of a comprehensive and developmental guidance and counseling program based on nationally recognized standards, as well as by defining the direct and indirect counseling services and counseling program service delivery and monitoring guidelines that are to be reflected in county policy and to be implemented at each school.

PURPOSE:

The purpose of this policy is to more clearly define the role of the school counselor as well as describe the components of a comprehensive developmental guidance and counseling program. The nine national standards for school counseling defined in §126-67-4 and §126-67-7 of this policy define the specific knowledge, attitudes and skills students should obtain or demonstrate as a result of participating in a school counseling program. These standards also link the comprehensive and developmental guidance and counseling program to the county/school academic mission by promoting national, state and local education goals, by making the school counseling program an integral part of the total educational program, and by helping assure a nurturing and orderly, safe, drug-free, violence- and harassment-free learning environment.

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TITLE 126
LEGISLATIVE RULE
BOARD OF EDUCATION

SERIES 67

Comprehensive Developmental Guidance and Counseling (2315)

FILED
2002 NOV 15 P 4: 5b
WEST VIRGINIA
SECRETARY OF STATE

§126-67-1. General.

1.1. Scope. -- This policy sets the requirements for Pre-K-12 comprehensive developmental guidance and counseling programs for schools in West Virginia that reflect the American School Counselor Association National Standards for School Counseling Programs model.

1.2. Authority. -- W.Va. Constitution, Article XII, §2, and W.Va. Code §18-2-5 and §18-5-18b.

1.3. Filing Date. -- November 15, 2002

1.4. Effective Date. -- December 15, 2002

1.5. Repeal of Former Rule. -- This legislative rule repeals and replaces W.Va. 126CSR67 "Comprehensive Developmental Guidance Policy" filed May 14, 1992 and effective September 1, 1993.

§126-67-2. Purpose.

2.1. The purpose of this policy is to define the components of a comprehensive and developmental guidance and counseling program based on nationally recognized standards, as well as define the direct and indirect counseling services and counseling program service delivery and monitoring guidelines that are to be reflected in county policy and to be implemented at each school. The nine national standards for school counseling defined in §126-67-4 and §126-67-7 of this policy link the comprehensive and developmental guidance and counseling program to the county/school academic mission by promoting national, state and local education goals, by making the school counseling program an integral part of the total educational program, and by helping assure a nurturing and orderly, safe, drug-free, violence- and harassment-free learning environment.

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§126-67-3. Application.

3.1. The county board of education and local schools shall establish and implement comprehensive developmental guidance and counseling programs designed to impart specific skills and learning opportunities in a proactive, preventive manner, ensuring that every student can achieve school success through academic, career and personal/social development experiences.

3.2. The school guidance and counseling program is comprehensive in scope, developmental in nature based on the national standards for school counseling programs, and is delivered by counselors, both individually and in collaboration with other professionals and through programs and activities, to every West Virginia public school student in grades Pre-K-12.

3.3. Developmental school guidance and counseling is for all students, has an organized and planned curriculum, is sequential and flexible, is an integrated part of the total educational process, involves all school personnel, helps students learn more effectively and efficiently, and includes counseling that integrates developmental perspectives that are both age appropriate and issue specific.

§126-67-4. Definitions.

4.1. Advocacy. Advocacy refers to the active support of causes, ideas or policies that promote and assist student academic, career, personal/social needs. One form of advocacy is the process of actively identifying under-represented students and supporting them in their efforts to perform at their highest level of academic achievement.

4.2. Collaboration. Collaboration is a partnership in which two or more individuals or organizations actively work together on a project or problem.

4.3. Comprehensive school guidance and counseling curriculum. The comprehensive school guidance and counseling curriculum component consists of structured developmental lessons designed to assist students in achieving the competencies and is presented systematically through classroom and group activities in grades Pre-K-12.

4.4. Comprehensive school guidance and counseling program. This program is an integral part of the total educational program that helps every student acquire the skills, knowledge and attitudes in the areas of academic, career and personal/social development that promote academic achievement and meet developmental needs.

4.5. Consultation. Consultation refers to a process in which counselors consult with parents or guardians, teachers, other educators and community agencies regarding

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strategies to help students and families. School counselors serve as student advocates.

4.6. **Counseling.** Counseling refers to a special type of helping process implemented by a professionally trained and certified person, involving a variety of techniques and strategies that help students explore academic, career and personal/social issues impeding healthy development or academic progress.

4.7. **Counseling-related administrative activities.** These activities include: developing and implementing counseling-related events such as orientation and transition programs, financial aid workshops, career and college planning processes, developmental guidance activities, preventive-focused programs and other student-centered activities; writing letters of recommendation; and coordinating with appropriate school officials to assure the maintenance of student records. Counseling activities of a clerical nature such as data entry, the filing of student records and forms, and the duplication of documents and materials for distribution when combined with counseling-related administrative activities, should not exceed more than 25% of the counselor's time.

4.8. **Crisis counseling.** Crisis counseling provides prevention, intervention and follow-up. Counseling and support are provided to students and families facing emergency situations. Such counseling is normally short term and temporary in nature, and usually results in a referral made to appropriate community resources. School counselors may provide a leadership role in the school district's crisis intervention team process.

4.9. **Individual and small-group counseling.** Counseling is provided in a small group or on an individual basis for students expressing difficulties dealing with relationships, personal concerns or normal developmental tasks. Individual and small-group counseling helps students identify problems, causes, alternative and possible consequences in order for appropriate action to be taken. Such counseling is normally short term in nature. When necessary, referrals are made to appropriate community resources.

4.10. **National standards for school counseling.** (See §126-67-7 of this policy. Guidance and counseling program content standards and student competencies.) The nine National Standards for School Counseling are organized in three categories of student development: academic, career and personal/social. These standards provide guidance and direction for states, school systems and individual schools to develop quality and effective school counseling programs. Each of the nine standards includes a list of student competencies that enumerate the desired student learning outcomes. The student competencies define the specific knowledge, attitudes and skills that students should obtain or demonstrate as a result of participating in a school counseling program.

4.11. **Non-counseling activities.** These are described as any activity or duty not related to the development, implementation, or evaluation of the counseling program.

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4.12. Peer facilitation. A technique in which counselors train students as peer mediators, conflict managers, tutors and mentors.

4.13. Program audit. A program audit refers to the assessment of the school counseling program on the components of the American School Counselor Association National Model; the primary purpose for collecting information is to guide future action within the program and to improve future results for students.

4.14. West Virginia Comprehensive Developmental Guidance and Counseling Program Guide. This program guide describes West Virginia's comprehensive developmental guidance and counseling program model and outlines a process for tailoring the model to meet the needs of individual West Virginia districts and schools.

§126-67-5. Components of a comprehensive developmental, national standards-based guidance and counseling program that are to be addressed by county policy.

5.1. Guidance curriculum. The guidance curriculum component consists of structured developmental lessons designed to assist students in achieving the competencies and is presented systematically through classroom and group activities in grades Pre-K-12. The purpose of the guidance curriculum is to provide all students the knowledge and skills appropriate for their developmental levels. The guidance curriculum is usually delivered using a collaborative model involving the school counselor, classroom teachers and other appropriate education professionals.

5.2. Individual planning with students. The individual planning component consists of school counselors coordinating ongoing systemic activities designed to assist the individual student in establishing personal goals and developing future plans. Counselor activities with students include: goal setting, career planning, and individual student academic program planning, including course selection and the interpretation and application of assessment information in a meaningful way to guide academic program planning. Individual planning with students assumes parental and other school staff involvement, and personalizes the educational experience by helping students set goals and develop pathways to realize academic, career and personal/social aspirations.

5.3. Responsive services. The responsive services component consists of activities to meet students' immediate needs. Responsive services may be provided in a direct format through individual and group counseling, including crisis counseling, or indirectly through consultation, peer facilitation or outside referral. Frequently dominated by presenting student issues or school building, community and parental concerns, responsive services may address peer pressure, conflict resolution, family relationships, personal identity issues, grief and loss, suicide, child abuse, substance abuse, school dropout

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prevention and motivation and achievement concerns. The responsive services provided by the school counselor for students with a severe crisis are usually short term and temporary in nature with the school counselor's area of responsibility being to refer the student to an appropriate community resource/agency, and to serve in a consultative capacity between the resource/agency and the school to assure consistent delivery of services. The school counselor may also assume a major role in developing and serving on a school/community crisis response team.

5.4. Systems support. The systems support component consists of the professional development, consultation, collaboration and teaming; and program management and operation activities that establish, maintain and enhance the total school counseling program. School counselors facilitate discussions on school improvement, examine data that impacts the success of various groups of students, and assist with professional development activities for the school faculty and staff.

§126-67-6. Comprehensive guidance and counseling program services, program monitoring, counselor qualifications, and time distribution.

6.1. Direct services target students and include: individual counseling, small group counseling, and classroom guidance.

6.2. Indirect services include the management of resources, consultation, collaboration and teaming, advocacy and the coordination of services.

6.3. Student growth and development is monitored by the achievement of student competencies found in the National Standards for School Counseling, and by the demonstration of positive results in the area of school improvement data.

6.4. School counselors are highly qualified as demonstrated by the possession of a master's degree in school counseling and a school counseling certificate valid in West Virginia.

6.5. School counselors spend at least 75% of their time in a direct counseling relationship with pupils.

6.6. School counselors devote no more than 25% of their time to counselor-related administrative activities and counseling activities of a clerical nature.

6.7. Suggested distribution of total school counselor time:

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| Delivery System Component | Elementary School % of Time | Middle School % of Time | High School % of Time |
|------------------------------------|------------------------------------|--------------------------------|------------------------------|
| Guidance Curriculum | 35%-40% | 25%-35% | 15%-25% |
| Individual Student Planning | 5%-10% | 15%-25% | 25%-35% |
| Responsive Services | 30%-40% | 30%-40% | 25%-35% |
| System Support | 10%-15% | 10%-15% | 15%-20% |

§126-67-7. Guidance and counseling program content standards and student competencies.

7.1. Academic development. The content standards for academic development guide the school counseling program to implement strategies and activities to support and enable students to experience academic success, maximize learning through commitment, produce high quality work, and be prepared for a full range of options and opportunities after high school. The academic development area includes the acquisition of skills in decision making, problem solving and goal setting, critical thinking, logical reasoning, and interpersonal communication and the application of these skills to academic achievement. The school counseling program enables all students to achieve success in school and to develop into contributing members of society. Academic development content standards are:

7.1.1. Standard 1: Students will acquire the attitudes, knowledge and skills that contribute to effective learning in school and across the life span. Examples of student competencies associated with this standard may include, but are not limited to:

- a. Students will articulate feelings of competence and confidence as learners.
- b. Students will display a positive interest in learning.
- c. Students will take pride in work and achievement.
- d. Students will accept mistakes as essential to the learning process.
- e. Students will identify attitudes and behaviors that lead to successful learning.
- f. Students will apply time management and task management skills.

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g. Students will demonstrate how effort and persistence positively affect learning.

h. Students will use communication skills to know when and how to ask for help when needed.

i. Students will apply knowledge of learning styles to positively influence school performance.

j. Students will take responsibility for their actions.

k. Students will demonstrate the ability to work independently and cooperatively with other students.

l. Students will develop a broad range of interests and abilities.

m. Students will demonstrate dependability, productivity, and initiative.

n. Students will share knowledge.

7.1.2. Standard 2: Students will complete school with the academic preparation essential to choose from a wide range of substantial post-secondary options, including college. Examples of student competencies associated with this standard may include, but are not limited to:

a. Students will demonstrate the motivation to achieve individual potential.

b. Students will learn and apply critical thinking skills.

c. Students will apply the study skills necessary for academic success at each level.

d. Students will seek information and support from faculty, staff, family and peers.

e. Students will organize and apply academic information from a variety of sources.

f. Students will use knowledge of learning styles to positively influence school performance.

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- g. Students will become self-directed and independent learners.
- h. Students will establish challenging academic goals in elementary, middle/junior high, and high school.
- i. Students will use assessment results in educational planning.
- j. Students will develop and implement an annual plan of study to maximize academic ability and achievement.
- k. Students will apply knowledge of aptitudes and interests to goal setting.
- l. Students will use problem-solving and decision-making skills to assess progress toward educational goals.
- m. Students will understand the relationship between classroom performance and success in school.
- n. Students will identify post-secondary options consistent with interests, achievement, aptitude and abilities.

7.1.3. Standard 3: Students will understand the relationship of academics to the world of work and to life at home and in the community. Examples of student competencies associated with this standard may include, but are not limited to:

- a. Students will demonstrate the ability to balance school, studies, extracurricular activities, leisure time and family life.
- b. Student will seek co-curricular and community experiences to enhance the school experience.
- c. Students will understand the relationship between learning and work.
- d. Students will demonstrate an understanding of the value of lifelong learning as essential to seeking, obtaining, and maintaining life goals.
- e. Students will understand that school success is the preparation to make the transition from student to community member.
- f. Students will understand how school success and academic achievement enhance future career and avocational opportunities.

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7.2. Career development. The content standards for career development guide the school counseling program to provide the foundation for the acquisition of skills, attitudes and knowledge enabling students to make a successful transition from school to the world of work and from job to job across the life career span. The career development content standards are:

7.2.1. Standard 4: Students will acquire the skills to investigate the world of work in relation to knowledge of self and to make informed career decisions. Examples of student competencies associated with this standard may include, but are not limited to:

- a. Students will develop skills to locate, evaluate, and interpret career information.
- b. Students will learn about the variety of traditional and nontraditional occupations.
- c. Students will develop an awareness of personal abilities, skills, interests, and motivations.
- d. Students will learn how to interact and work cooperatively in teams.
- e. Students will learn to make decisions.
- f. Students will learn how to set goals.
- g. Students will understand the importance of planning.
- h. Students will pursue and develop competency in areas of interest.
- i. Students will develop avocational interests.
- j. Students will learn to balance work and leisure time.
- k. Students will acquire employability skills such as working on a team, problem solving, and organizational skills.
- l. Students will apply job readiness skills to seek employment opportunities.
- m. Students will demonstrate knowledge about the changing workplace.

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- n. Students will learn about the rights and responsibilities of employers and employees.
- o. Students will learn to respect individual uniqueness in the workplace.
- p. Students will learn how to write a resume.
- q. Students will develop a positive attitude toward work and learning.
- r. Students will understand the importance of responsibility, dependability, punctuality, integrity, and effort in the workplace.
- s. Students will utilize time and task management skills.

7.2.2. Standard 5: Students will employ strategies to achieve future career success and satisfaction. Examples of student competencies associated with this standard may include, but are not limited to:

- a. Students will apply decision-making skills to career planning, course selection, and career transitions.
- b. Students will identify personal skills, interests, and abilities and relate them to current career choices.
- c. Students will demonstrate knowledge of the career planning process.
- d. Students will know the various ways which occupations can be classified.
- e. Students will use research and information resources to obtain career information.
- f. Students will learn to use the Internet to access career planning information.
- g. Students will describe traditional and nontraditional occupations and how these relate to career choice.
- h. Students will understand how changing economic and societal needs influence employment trends and future training.

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i. Students will demonstrate awareness of the education and training needed to achieve career goals.

j. Students will assess and modify their educational plans to support career goals.

k. Students will use employability and job readiness skills in internship, mentoring, shadowing, and/or other world of work experiences.

l. Students will select coursework that is related to career interests.

m. Students will maintain a career planning portfolio.

7.2.3. Standard 6: Students will understand the relationship between personal qualities, education and training, and the world of work. Examples of student competencies associated with this standard may include, but are not limited to:

a. Students will understand the relationship between educational achievement and career success.

b. Students will explain how work can help to achieve personal success and satisfaction.

c. Students will identify personal preferences and interests that influence career choices and success.

d. Students will understand that the changing workplace requires lifelong learning and acquiring new skills.

e. Students will describe the effect of work on lifestyles.

f. Students will understand the importance of equity and access in career choice.

g. Students will understand that work is an important and satisfying means of personal expression.

h. Students will demonstrate how interests, abilities, and achievement relate to achieving personal, social, educational, and career goals.

i. Students will learn how to use conflict management skills with peers and adults.

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j. Students will learn to work cooperatively with others as a team member.

k. Students will apply academic and employment readiness skills in work-based learning situations such as internships, shadowing, and mentoring experiences.

7.3. Personal/social development. The content standards for personal/social development guide the school counseling program to provide the foundation for personal and social growth as students progress through school and into adulthood. The personal/social development content standards are:

7.3.1. Standard 7: Students will acquire the attitudes, knowledge and interpersonal skills to help them understand and respect self and others. Examples of student competencies associated with this standard may include, but are not limited to:

a. Students will develop a positive attitude toward self as a unique and worthy person.

b. Students will identify personal values, attitudes and beliefs.

c. Students will learn the goal setting process.

d. Students will understand change as a part of growth.

e. Students will identify and express feelings.

f. Students will distinguish between appropriate and inappropriate behaviors.

g. Students will recognize personal boundaries, rights, and privacy needs.

h. Students will understand the need for self-control and how to practice it.

i. Students will demonstrate cooperative behavior in groups.

j. Students will identify personal strengths and assets.

k. Students will identify and discuss changing personal and social roles.

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- l. Students will identify and recognize changing family roles.
- m. Students will recognize the rights and responsibilities of all persons.
- n. Students will respect alternative points of view.
- o. Students will recognize and respect individual ethnic and cultural differences.
- p. Students will use effective communication skills.
- q. Students will recognize that communication involves speaking, listening, and non-verbal behavior.
- r. Students will learn how to communicate effectively.
- s. Students will learn how to make and keep friends.

7.3.2. Standard 8: Students will make decisions, set goals, and take necessary action to achieve goals. Examples of student competencies associated with this standard may include, but are not limited to:

- a. Students will use a decision-making and a problem-solving model.
- b. Students will understand consequences of decisions and choices.
- c. Students will identify alternative solutions to a problem.
- d. Students will develop effective coping skills for dealing with problems.
- e. Students will demonstrate when, where, and how to seek help for solving problems and making decisions.
- f. Students will know how to apply conflict resolution skills.
- g. Students will know when peer pressure is influencing a decision.
- h. Students will identify long- and short-term goals.
- i. Students will identify alternative ways of achieving goals.

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j. Students will use persistence and perseverance in acquiring knowledge and skills.

k. Students will develop an action plan to set and achieve realistic goals.

7.3.3. Standard 9: Students will understand safety and survival skills. Examples of student competencies associated with this standard may include, but are not limited to:

a. Students will demonstrate knowledge of personal information (e.g., telephone number, home address, emergency contact).

b. Students will learn about the relationship between rules, laws, safety, and the protection of an individual's rights.

c. Students will learn the difference between appropriate and inappropriate physical contact.

d. Students will demonstrate the ability to assert boundaries, rights and personal privacy.

e. Students will differentiate between situations requiring peer support and situations requiring adult professional help.

f. Students will identify resource people in the school and community and know how to seek their help.

g. Students will apply effective problem-solving and decision-making skills to make safe and healthy choices.

h. Students will learn about the emotional and physical dangers of substance use and abuse.

i. Students will learn how to cope with peer pressure.

j. Students will learn techniques for managing stress and conflict.

k. Students will learn coping skills for managing life events.

§126-67-8. Responsibility.

8.1. The West Virginia Board of Education, Regional Education Service Agencies

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(RESAs), and the West Virginia Center for Professional Development have the responsibility for providing professional development, technical assistance and support to each county board of education in the development and implementation of the comprehensive guidance and counseling program and policy, including training for counselors and administrators to implement the national standards as provided in W.Va. Code §18-5-18b. The West Virginia Department of Education shall also be responsible for the development and distribution of the school counseling program guide to be used by counties as a resource in professional development and planning activities.

8.2. By September 1, 2003, each county board of education shall revise and submit for approval to the West Virginia Department of Education a comprehensive developmental guidance policy for schools. This policy should address the National Standards for School Counseling, be aligned with the unified school and county improvement plans, and reflect provisions in W.Va. Code §18-5-18b. Based on an assessment of current school counseling practice, this policy should also identify the measures of success for student competencies in each of the three areas of academic, career and personal/social development.

§126-67-9. Severability.

9.1. If any provision of this rule or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of this rule.

FISCAL NOTE WORKSHEET

(Submit 4 Copies)

HD NO _____ DRAFT NO _____ BILL NO _____ RESOLUTION NO _____

SUBJECT Comprehensive Developmental Guidance and Counseling Policy 2315 FUND _____

SOURCE OF REVENUE: GENERAL FUND SPECIAL OTHER (SPECIFY) _____

COST OF ESTIMATE BASED ON: AN ORIGINAL ESTIMATE BUDGET BILL OTHER (SPECIFY) _____

INCOME ESTIMATE BASED ON: AN ORIGINAL ESTIMATE BUDGET BILL OTHER (SPECIFY) _____

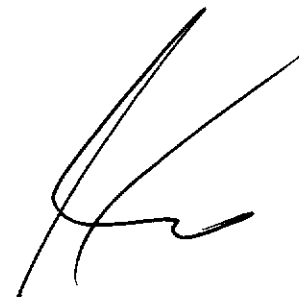
SHOW OVER-ALL EFFECT IN ITEMS 1 AND 2 & GIVE EXPLANATION OF BREAKDOWN BY FISCAL YEAR INCLUDING LONG-RANGE EFFECT

| EFFECT OF PROPOSAL | ANNUAL | | FISCAL YEAR | | |
|--|----------|----------|-------------|------|------------|
| | INCREASE | DECREASE | CURRENT | NEXT | THEREAFTER |
| 1. ESTIMATED TOTAL COST | \$ | \$ | \$ | \$ | \$ |
| PERSONAL SERVICES CURRENT EXPENSES REPAIRS/ALTERATIONS EQUIPMENT OTHER | \$ | \$ | \$ | \$ | \$ |
| 2. ESTIMATED TOTAL REVENUES | \$ | \$ | \$ | \$ | \$ |

3. EXPLANATION OF ABOVE ESTIMATES (INCLUDING LONG-RANGE EFFECT):

11/13/02
DATE

Education
AGENCY


AUTHORIZED REPRESENTATIVE

**POLICY 2315: COMPREHENSIVE DEVELOPMENTAL GUIDANCE AND COUNSELING
COMMENT LOG**

September 19-October 18, 2002

Action Type
 N: No Response - Negative
 NA: Not Accepted + Positive
 A: Accepted o Neutral

| Date | Individual/Organization | Comments | Action/ Type | Rationale |
|---------|---|--|-----------------|---|
| 9/19/02 | Billie Davis 12 Warren Place Charleston, WV 25302 | <p>§126-67-1. General.</p> <p>After studying Policy 2315, which is an excellent move toward improving counseling services to students in the public schools of West Virginia, I strongly suggest that there be, throughout the policy, <u>very specific language</u> indicating that <u>developmental strategies</u> need to be created in a <u>collaborative team effort</u> involving all counselors within each high school attendance area: elementary, middle/junior high, senior high.</p> <p>Elementary counselors need to know what their students will face at the next level and need to be able to prepare the receiving middle/junior high counselors with information about the developmental guidance these students already have experienced. A smooth transition is vital to the success of these students.</p> <p>Similar transition activities and information are needed between middle/junior high counselors and the receiving senior high counselors. <u>All</u> of these counselors need to know each other and spend time together preparing for <u>their</u> students.</p> | NA/0 | These strategies will be addressed in the counseling program guide to be developed and distributed to counties by WVDE. |

| | | \$126-67-1. General. (con't.) | | |
|----------|---|--|------|--|
| 9/19/02 | Billie Davis 12 Warren Place Charleston, WV 25302 | Appropriate specific language might include "elementary, middle/junior high and senior high school counselors working in the same high school attendance area are to develop their k-12 comprehensive guidance and counseling plans together." Since repetition works, such language might be added to 3.1, 3.2, 3.3, 4.2, 4.3, 4.4, 4.14, 5.2, 5.4, 7.1. This policy will mean nothing unless it is enforced | NA/0 | These strategies will be addressed in the counseling program guide to be developed and distributed to counties by WVDE. |
| 9/27/02 | Vicki Lagos Counselor Collins Middle School Oak Hill, WV 25901 | I suggest that testing and all testing-related activities be included under 4.7—counseling - related activities. | N/0 | Some testing-related activities are appropriate counselor activities. |
| 9/30/02 | Barb Judy Counselor Bridgeport High School | This policy that you are proposing is excellent. It truly does address our needs and makes it easy to define our job to others. | N/+ | Positive comment regarding policy. |
| 10/15/02 | Thomas D. Kidd Principal John Adams Middle School Charleston, WV 25314 | Over all several parts of this policy are well written and serve a practical approach to counseling services. | N/+ | Positive comment regarding policy. |
| 10/18/02 | Barbara Blackburn Counselor Greenbrier East High | This is an incredible step in the right direction. Thank your efforts in this policy and for consideration of my comments. | N/+ | Positive comment regarding policy. |
| 10/18/02 | Judd Ashcraft Principal North Marion High School | On the high school level one essential role that counselors have been involved in for many years is student scheduling. This policy seems to be another attempt to prevent counselors from doing the "nuts and bolts", "paperwork", "data entry" tasks that we all have to do as teachers and administrators. An unfunded" time" mandate if I ever saw one. If you were really serious about student direct services you would work to increase the number of professionals per 1000 formula. And where are the mandated counselor student ratios? | A/- | Section 5.2 was revised to clarify what course selection and individual academic program planning are included in the individual planning component of the policy. |

| | | | | | | |
|----------|---|-------------------------------------|---|------|--|---|
| 10/18/02 | Judd Ashcraft Principal North Marion High School | §126-67-1. General. (con't.) | Our parents want an educational guidance counselor to help with course selection and academic success, graduation requirements, scholarships, and Financial Aid, not a career instructors. This sounds like a "its not my job man" policy that I am sure will be used by many unproductive counselors who say they need 8 hours to serve 8 students. And what is this "no more than 25% of their time on counselor related administrative duties" stuff. Am I to keep track of time spent counseling students verses doing administrative duties. What is a good expectation; say 10 min per kid per problem for counseling and 3 min per kid for record keeping. Are you requiring a WVEIS operator for each counseling department? The days of specialization where teachers only teach, counselors only counsel and administrators administrate have been tossed aside long ago by previous state policies. You can't go back without eliminating something not just shifting to someone else. The plate is full.! There, I feel better. | A/- | | Section 4.7 was revised to clarify that counseling-related administrative activities and counseling activities of clerical nature should comprise no more than 25% of the counselor's time. |
| 10/18/02 | Carol Thom Principal Stonewall Jackson Middle | | OK | NA/0 | | No changes made to the section in response to this comment. |
| 10/18/92 | Wendy Imperial School Counselor Bridgeport Middle Bridgeport, WV | | First and foremost, I am thrilled to see the interest in the school counseling arena. This policy is a clear definition/description of our role as school counselors. I am blessed to be at a middle school that has a supportive administration that enables me to "be here for the students." Paperwork is an enormous task, being the only counselor with an enrollment over 650 students. I am proud to be an advocate (and sometimes the only one) for each child in my building. As a counseling educator, the definitions help support graduate programs that encourage use of theory and creative techniques in direct counseling including individual, group, and developmental guidance activities. | N/+ | | Positive comment about policy. |

| | §126-67-1. General. (con't.) | | | |
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| 10/18/92 | Wendy Imperial School Counselor Bridgeport Middle Bridgeport, WV | It may take years for county systems to adequately implement this policy as it will require reduction of paperwork done by counselors. BUT, implementation is an administrative problem and we must not defeat a well-written counseling policy based on concerns counties have on its implementation! | N/+ | Positive comment about policy. |
| 10/18/02 | Sue Ann Shroyer Guidance Counselor Washington Irving Middle | This section is very positive and specific—replaces a vague and non-specific policy. DO NOT CHANGE THIS SECTION! | N/+ | Positive comment about policy. |
| | §126-67-2. Purpose. | | | |
| 10/18/02 | Barbara Blackburn Counselor Greenbrier East High | More emphasis needs to be put on collaboration. Example: Ensure the school counseling programs are comprehensive in design and delivered in a systematic collaborative fashion utilizing school staff and community resources to ensuring all students can achieve success. | NA/0 | The counseling program guide will include suggestions for collaboration. |
| 10/18/02 | Betsy Mullett Program Coordinator Monongalia County Schools | (Suggested re-wording) 2.1 ... and by helping assure a nurturing and orderly, safe, drug free, violence and harassment-free learning environment free of drugs, violence, and harassment. | NA/0 | No changes made to the section in response to this comment. |
| 10/18/02 | Carol Thom Principal Stonewall Jackson Middle | GOOD! | N/+ | Positive comment about policy. |
| 10/18/02 | Sue Ann Shroyer Guidance Counselor Washington Irving Middle | This section is very specific and to the point. DO NOT CHANGE THIS SECTION. | N/+ | Positive comment about policy. |
| | §126-67-3. Application. | | | |
| 10/18/02 | Barbara Blackburn Counselor Greenbrier East High | 3.1 - ensuring that every student can achieve success. 3.3 - Fantastic! | N | Positive comment about policy. |
| 10/18/02 | Lawrence M. Miller Superintendent Ohio County Schools | The use of "proactive, preventive" is of great importance. | N/+ | Positive comment about policy. |

| | | §126-67-3. Application. (con't.) | | | |
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| 10/18/02 | Carol Thom Principal Stonewall Jackson Middle | GOOD! | | N/+ | Positive comment about policy. |
| 10/18/02 | Sue Ann Shroyer Guidance Counselor Washington Irving Middle | This section finally has some "teeth" in addressing what counselors will do and the role they will play in the school setting. DO NOT CHANGE THIS SECTION! | | N/+ | Positive comment about policy. |
| | | §126-67-4. Definitions. | | | |
| 10/1/02 | Louis W. Fratt Principal Washington Irving M.S. | 4.7. - I want to object to what is not included in the counseling-related admin. activities. What this document if passed will create is a major problem in getting students registered, transcript sent to other schools and maintaining student records. This will not be in the best interest of children. We are asked to cut back 10% by the Governor and this will be reflected in clerical personnel. It is extremely important that the counselor have hands on personal approach with student involvement. | | A/- | Section 4.7 was revised to clarify that counseling-related administrative activities and counseling activities of clerical nature should comprise no more than 25% of the counselor's time. Section 5.2 was revised to clarify what course selection and individual academic program planning are included in the individual planning component of the policy. |
| 10/15/02 | Principal Musselman Middle School Bunker Hill, WV 25413 | 4.7 - Counseling-related administrative. If a counselor is not permitted to file some student records or make copies of student records. Then who is to perform these activities? Do you not realize that we do not have sufficient clerical staff to perform these duties. The do not include part of 4.7 needs to be stricken. | | A/- | Section 4.7 was revised to clarify that counseling-related administrative activities and counseling activities of clerical nature should comprise no more than 25% of the counselor's time. |
| 10/15/02 | Thomas D. Kidd Principal John Adams Middle School Charleston, WV 25314 | 4.7 - I strongly disagree with the last sentence of this section. Principals and counselors need to develop their own professional work relationship and not have every little detail defined by policy. In addition counseling positions are funded by levy and not state code. Over regulation does not support a healthy and conducive work environment. I would ask you to delete the last sentence of 4.7. | | A/- | Section 4.7 was revised to clarify that counseling-related administrative activities and counseling activities of clerical nature should comprise no more than 25% of the counselor's time. |

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| | | \$126-67-4. Definitions. (con't.) | | | <p>Section 4.7 was revised to clarify that counseling-related administrative activities and counseling activities of clerical nature should comprise no more than 25% of the counselor's time.</p> |
| 10/18/02 | Barbara Blackburn Counselor Greenbrier East High | <p>4.5 - Add Administrators 4.6- After help students...add...explore and make informed decisions regarding academic... 4.7- This still does not address the counselor's role in testing, master schedule development, etc. I believe that the appropriate/inappropriate duties list the Task Force developed should be referenced here as well as page 23 in the ASCA National Model book. Inappropriate duties are a huge detriment to successful school counseling programs. I would like to see WV</p> | A/0 | <p>Legislation requires the 75/25 use of time for counselors.</p> | |
| 10/18/02 | Barbara Blackburn Counselor Greenbrier East High | <p>step to the forefront and use the terminology 100% of the counselors time will be spent planning and implementing National Standards programming. Anything else is inappropriate and robbing the students in WV. 4.12- change "counselors train students" to "students are trained to assist counselors as peer... Training is a collaborative effort. It is not done solely by the school counselor.</p> | NA/0 | <p>Positive comment about policy.</p> | |
| 10/18/02 | Lawrence M. Miller Superintendent Ohio County Schools | <p>This section is well defined and emphasizes the duties of the counselor.</p> | N/+ | <p>Section 4.7 was revised to clarify that counseling-related administrative activities and counseling activities of clerical nature should comprise no more than 25% of the counselor's time. The intent of the policy is to focus on providing the counseling services recommended by the American School Counselor Association in order to assure a comprehensive counseling program.</p> | |
| 10/18/02 | Viola Huff Principal Edison Jr. High School Parkersburg, WV | <p>I don't know any job in education that doesn't entail some type of clerical responsibilities. From the superintendent's desk to the principal's desk, everyone is working overtime to keep up. My counselor doesn't do any administrative tasks. She counsels students individually, and administers the Writing Assessment, Act Explore and the SAT 9 tests.</p> | A/0 | <p>Section 4.7 was revised to clarify that counseling-related administrative activities and counseling activities of clerical nature should comprise no more than 25% of the counselor's time.</p> | |
| 10/18/02 | Paul E. Barcus, Jr. Superintendent Wetzel County Schools | <p>4.7 - The items listed under the "do not include" section at the end will cause additional "mandated but unfunded" sections - if counselors cannot do such duties. Volunteers and student workers cannot do these jobs due to the confidentiality of certain records. - counselors can, should, and must be able to spend part of their time in these areas. 4.11 - the above can and should be considered as part of the implementation of this program.</p> | A/- | <p>Section 4.7 was revised to clarify that counseling-related administrative activities and counseling activities of clerical nature should comprise no more than 25% of the counselor's time.</p> | |

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| 10/18/02 | Carl H. Friebe, Jr. Superintendent Harrison County Schools | <p>§126-67-4. Definitions. (con't.)</p> <p>Exempting counselors from "data entry, filing of student records and forms, and duplicating documents, materials," etc. presents two significant problems:</p> <ol style="list-style-type: none"> 1. If counselors are exempted, how are we to explain to teachers and administrators that they must continue doing data entry, filing, and maintaining student records and grades and attendance and duplicating all kinds of things for the classroom, etc.? In most buildings, all professionals are involved daily in those activities that counselors will now be exempt should this policy be adopted as written. 2. Assuming that the current verbiage remains, school secretaries who are already taxed will undoubtedly be given the bulk of the work that counselors are protected from doing. I don't know very many secretaries who aren't really busy keeping up with their own work loads. | A/- | <p>Section 4.7 was revised to clarify that counseling-related administrative activities and counseling activities of clerical nature should comprise no more than 25% of the counselor's time.</p> <p>The intent of the policy is to focus on providing the counseling services recommended by the American School Counselor Association in order to assure a comprehensive counseling program.</p> |
| 10/18/02 | John F. Branham Principal Bridgeport Middle School Bridgeport, WV | <p>The last sentence in section 126-67-4.7 of the proposed Policy 2315 - Comprehensive Developmental Guidance Policy concerns me. I want to make it very clear I am very supportive of the plight of school counselors and the volume of work they have. Our counselor is the lifeblood of our school. Without her significant input, work ethic, and individual counseling of our students, we would not be where we are today - a thriving, student oriented, academically successful, and safe school. The problem is not the clause but the manner in which we are to accomplish these tasks for the counselor with our present staff limitations. One of our full time secretaries was reduced to half time and she works with the lunch program and its many reports plus answering the phone and dealing with the public as they enter the office. Our other secretary is the accountant and is swamped with financial matters, tending to staff needs as well as answering the phone and dealing with the public. To require one of them to do filing would take them out of the office and cause a significant overload to already short-handed secretaries.</p> | A/0 | <p>Section 4.7 was revised to clarify that counseling-related administrative activities and counseling activities of clerical nature should comprise no more than 25% of the counselor's time.</p> <p>The intent of the policy is to focus on providing the counseling services recommended by the American School Counselor Association in order to assure a comprehensive counseling program.</p> |

| | §126-67-4. Definitions. (con't.) | | |
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| 10/18/02 | <p>Is there a provision for the increase in clerical staff needed to accomplish these tasks? We do handle all data entry and assist in the duplication of documents and materials, however. Please consider this when you look at Policy 2315 and provide us assistance or provide stipends for counselors or other clerical help to accomplish these tasks. Counseling-related administrative activities do not include: activities of a clerical nature such as data entry, the filing of student records and forms, and the duplication of documents and materials for distribution.</p> | John F. Branham Principal Bridgeport Middle School Bridgeport, WV | A/- |
| 10/18/02 | <p>4.7 - Counseling-related administrative activities: If you completely eliminate data-entry, duplication of forms, and filing, I hope you will fund clerical staff for counselors. Someone will have to take up the slack and there is no one available to do it at this time. This is, in my opinion, not realistic unless you provide the additional help required.</p> | Carol Thom Principal Stonewall Jackson Middle | A/- |
| 10/18/02 | <p>This entire section is excellent! 4.7 Excellent - specifies what counselors should <u>not</u> do 4.11 Excellent - especially the definition of non-counseling DO NOT CHANGE THIS SECTION!</p> | Sue Ann Shroyer Guidance Counselor Washington Irving Middle | N/+ |
| 10/18/02 | <p>4.3 - "Structures developmental lessons" and "presented systematically" - this delivery must be flexible, must involve all school personnel as stated in 3.3, and must <u>NOT</u> be an assigned class on the schools' master schedules for the counselors because of counselor intervention that is needed in student crises or problems that occur on a daily basis. 4.7 - We Agree that data entry and filing are not counselor-related activities. 4.13 - Program Audit - Must involve school counselors in developing the audit assessment tool.</p> | Counselors Liberty High School Clarksburg, WV | N/A/0 |

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| | <p>§126-67-5. Components of a comprehensive developmental, national standards-based guidance and counseling program that are to be addressed by county policy.</p> | | |
| 10/18/02 | <p>Betsy Mullett Program Coordinator Monongalia County Schools</p> | <p>(Suggested re-wording)</p> <p>5.3 Responsive Services ... Responsive services may be provided in a direct format directly through...</p> | NA/0 |
| 10/18/02 | <p>Barbara Blackburn Counselor Greenbrier East High</p> | <p>5.2 - Change work in line 7 from 'assumes' to encourages <u>parental</u> "ADD other "and school staff"</p> <p>ADD</p> <p>5.4. <u>Crisis Response</u>. The school counselor assumes a major role in developing and serving on a school/community Crisis Response Team to assist the school in readiness in case of a crisis that affects a large portion of the school population. This Crisis Response Team will be composed of the school counselor, a school administrator, students, faculty members, and community resource personnel.</p> | NA/0 |
| 10/18/02 | <p>Elizabeth Beale Principal Magnolia High School New Martinsville, WV</p> | <p>If this policy revision is passed the Guidance Counselors will not be doing any work such as:</p> <ol style="list-style-type: none"> 1. enrolling students, 2. sending transcripts, 3. copying records, and/or 4. filing of students' records. 1. This is a necessary role and duty for Counselors so that they can meet the students and gain an early contact with their needs, goals, etc. 2. This is a necessary role and duty for Counselors since they have guided the students to graduation, kept their records and have best knowledge of the students. 3. & 4. For familiarity and confidentiality, the Counselor is the staff person most knowledgeable and able to keep records. | A/- |
| 10/18/02 | <p>Carol Thom Principal Stonewall Jackson Middle</p> | <p>GOOD!</p> | N/+ |

The counseling program guide will include recommendations for the counselor's role in crisis response.

Section 4.7 was revised to clarify that counseling-related administrative activities and counseling activities of clerical nature should comprise no more than 25% of the counselor's time.
The intent of the policy is to focus on providing the counseling services recommended by the American School Counselor Association in order to assure a comprehensive counseling program.

Positive comment about policy.

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| | | <p>§126-67-5. Components of a comprehensive developmental, national standards-based guidance and counseling program that are to be addressed by county policy. (con't.)</p> | | |
| 10/18/02 | Sue Ann Shroyer Guidance Counselor Washington Irving Middle | <p>This section will be a positive influence in all schools because all students will now receive these national/state standards. Counselors at all levels will be able to build on standards which should have been learned in the lower grades. DO NOT CHANGE THIS SECTION!</p> | A/+ | Positive comment about policy. |
| 10/18/02 | Counselors Liberty High School Clarksburg, WV | <p>5.1 - "The guidance curriculum consists of structured developmental lessons....". This must have a flexible delivery and not assigned as a specific class period to school personnel/counselors. "....is presented systematically" – Again there has to be flexibility since counselors have issues arise unexpectedly and must deal with a variety of situations such as enrollment withdrawals, personal student issues, testing, etc.</p> | NA/0 | The counseling program guide will include recommendations for the counselor's role in crisis response. |
| | | <p>§126-67-6. Comprehensive guidance and counseling program services, program monitoring, counselor qualifications, and time distribution.</p> | | |
| 10/18/02 | Barbara Blackburn Counselor Greenbrier East High | <p>6.5. - Add - School counselors spend 100% of their time planning, coordinating, and delivering a National Standards based program using the following code in utilizing their time. 6.5a = 6.5 6.5b = 6.6 Language in both of these need to be consistent! 75% of their time 25% of their time.</p> | A/0 | The language in 6.6 was revised to make it consistent with 6.5. |
| 10/18/02 | Paul E. Barcus, Jr. Superintendent Wetzel County Schools | <p>6.7 - My comments in 4.7 can and should be considered as "System Support" or "Individual Student Planning."</p> | A/0 | Section 4.7 was revised to clarify that counseling-related administrative activities and counseling activities of clerical nature should comprise no more than 25% of the counselor's time. The intent of the policy is to focus on providing the counseling services recommended by the American School Counselor Association in order to assure a comprehensive counseling program. |

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| 10/18/02 | Carl H. Friebe, Jr. Superintendent Harrison County Schools | <p>§126-67-6. Comprehensive guidance and counseling program services, program monitoring, counselor qualifications, and time distribution. (con't.)</p> <p>shared by <u>all</u> professional staff members. It appears that counselors will no longer share in these responsibilities.</p> <p>Fiscal Note Worksheet - Please realize that the implementation of this policy will not be free. I believe county school systems will have to give strong consideration to hiring additional clerks to manage these responsibilities. It is unfortunate that new hirings will be occurring simultaneously with the decrease in county funds as the result of the anticipated governor's budget cut.</p> | NA/- | The intent of the policy is to focus on providing the counseling services recommended by the American School Counselor Association in order to assure a comprehensive counseling program. |
| 10/18/02 | Betsy Mullett Program Coordinator Monongalia County Schools | <p>(Suggested change)</p> <p><u>6.5 School counselors spend at least 75% of their time in a combination of those activities categorized as direct-counseling-relationship-with-pupils and indirect services to students.</u></p> <p>Rationale: Counselors spend a significant amount of time consulting/collaborating/and teaming with parents, other educators, and community service providers that is directed toward strengthening a student's support system. NOT to count these activities as part of the 75% will decrease time spent in these modes. Such "indirect services" are not classified under either the 75% or the 25% guidelines and need to be.</p> | NA/0 | No changes made to the section in response to this comment. |
| 10/18/02 | Carol Thom Principal Stonewall Jackson Middle | <p>I would reduce the guidance curriculum percentage to about 20% and increase the individual student planning percentage to about 30%. Middle age students need more one on one support.</p> | NA/0 | No changes made to the section in response to this comment. |
| 10/18/02 | Wendy Imperial School Counselor Bridgeport Middle School Bridgeport, WV | <p>My only concern with this distribution of counseling activities is the inequity of enrollment per counselor. Our county has one counselor per middle school regardless of school size. Enrollment in our six middle schools ranges from under 200 to over 650 students. It</p> | NA/0 | The distribution of counselor time is a recommendation. |

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| | | <p>§126-67-6. Comprehensive guidance and counseling program services, program monitoring, counselor qualifications, and time distribution. (con't.)</p> | | |
| <p>10/18/02</p> | <p>Wendy Imperial School Counselor Bridgeport Middle School Bridgeport, WV</p> | <p>would be impossible for me to provide necessary "response services" to my 650+ students if I am "forced" to spend 25-35% of my day in a classroom. Developmental guidance activities are often provided through our advisor/advisee period (under the middle school concept) as my time availability makes classroom guidance a luxury for me, not a commonality! I say "forced" in the above sentence because I feel that the interpretation of this chart may provide administrators the leverage to use counselors as teachers to help alleviate "crunches" in their related arts scheduling. (This is already being done in one of our middle schools.)</p> | <p>NA/0</p> | <p>The distribution of counselor time is a recommendation. The counseling program guide will include suggested methods for delivery of developmental guidance services.</p> |
| <p>10/18/02</p> | <p>Sue Ann Shroyer Guidance Counselor Washington Irving Middle</p> | <p>This revised policy should have included a student to counselor ratio of 250 to 1. Also, the suggested ratios of how a counselor's time should be spent should be made specific. This could allow a principal or county office person to manipulate these percentages and cause a weakness in the program.</p> | <p>NA/0</p> | <p>This requires a legislative mandate.</p> |
| <p>10/18/02</p> | <p>Counselors Liberty High School Clarksburg, WV</p> | <p>6.1 - "classroom guidance" - must be flexible and not, assigned in master schedule. 6.7 - Distribution of counselor time - guidance curriculum percentage of time for high school should not be more than 10 percent.</p> | <p>NA/0</p> | <p>The distribution of counselor time is a recommendation. The counseling program guide will include suggested methods for delivery of developmental guidance services.</p> |
| <p>10/18/02</p> | <p>Lawrence M. Miller Superintendent Ohio County Schools</p> | <p>§126-67-7. Guidance and counseling program content standards and student competencies.</p> <p>This section lists attitudes, knowledge, and skills that are beneficial for students to BE TAUGHT, however, these standards are difficult to assess in counseling. It would be better to state that STUDENTS WILL LEARN TO, rather than simply saying that the students will. How will you evaluate?</p> | <p>NA/0</p> | <p>The counseling program guide will include suggested models for measuring student competencies.</p> |

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| | | <p>§126-67-7. Guidance and counseling program content standards and student competencies. (con't.)</p> | | |
| 10/18/02 | Lawrence M. Miller Superintendent Ohio County Schools | It will be extremely difficult, if possible at all, to measure the level of success for these competencies. How will a counselor be judged on efficiency and progress in all these areas? | NA/0 | The counseling program guide will include suggested models for measuring student competencies. |
| 10/18/02 | Carol Thom Principal Stonewall Jackson Middle | Ambitious! Idealistic! But Much Needed. | N/+ | Positive comment about policy. |
| 10/18/02 | Sue Ann Shroyer Guidance Counselor Washington Irving Middle | This section is very specific, positive and encompasses a wide range of areas. DO NOT CHANGE THIS SECTION! | N/+ | Positive comment about policy. |
| 10/18/02 | Lawrence M. Miller Superintendent Ohio County Schools | §126-67-8. Responsibility. It appears by the wording that the counselor is made responsible for the students behavior rather than the task of teaching the skill. How can a counselor be responsible for a student's action, example 7.3.1a. It should be stated "students will be taught how to develop a positive attitude. | NA/0 | The counseling program guide will include suggested models for measuring student competencies. |
| 10/18/02 | Barbara Blackburn Counselor Greenbrier East High | WVSCA would like to see more emphasis put on continuing education for counselors. Currently counselors are not required to pursue any additional training in school counseling, just the regular in-service that classroom teachers are mandated! We have many stagnated, out-of-date counselors delivering substandard programs to our students. We must mandate annual training for counselors and reward those who are going above and beyond. I am suggesting an additional line items such as: 8.2 - The West Virginia Board of Education endorse code changes requiring financial incentives be provided to school counselors who seek professional credentials beyond minimal WV requirements in order to assure that WV students are provided with high trained counselors. Nationally recognized credentials include National Certified Counselor (NCC), National Certified School Counselor (NCSC), National Board for Professional Teaching Standards (NBPTS), and Licensed | NA/0 | Section 8.1 addresses this comment. No changes made to the section in response to this comment. |

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| 10/18/02 | Barbara Blackburn Counselor Greenbrier East | <p>§126-67-8. Responsibility. (cont.)</p> <p>Professional Counselors (LPC). These credentials require and assure that school counselors continue to receive advanced continuing education in the field of counseling to assure they are well-prepared to meet the needs of an ever-changing student population and educational system.</p> <p>Please consider the following:</p> <ul style="list-style-type: none"> • FACT: West Virginia leads the way in recognizing and compensating teachers for National Board Certification, since 2000 when the first WV teacher achieved National Certification from the National Board for Professional Teaching Standards (NBPTS), an independent, not-for-profit organization, endorsed by the NEA/WVEA and AFT/WVFT. School counselors also unequivocally support this movement as a vehicle for promoting better teaching, better learning, and better schools. <u>COST: \$2,300 plus up to \$600 in expenses, reimbursable through WVD OE. Length of Certification: 10 years, no continuing education requirement.</u> • FACT: West Virginia leads the way in licensing professional counselors (LPC), since 1987 with a flagship law that requires: Master's degree in counseling or closely related field, a minimum of 2,400 hours (2 years) of supervised experience beyond the master's degree by an accredited supervisor, and a passing score on the National Counselor Exam. The credential (LPC) is awarded to qualified counselors by the legislative licensing board, the WV Board of Examiners in Counseling (WVBEC). This board also reviews legal and ethical complaints from clients/consumers about licensed professional counselors, making the LPC credential reach beyond the setting of minimum standards for practice. | NA /0 | This comment needs to be addressed outside of this policy. |
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| | | | <p>10/18/02</p> |
| | <p>\$126-67-8. Responsibility. (con't.)</p> <p><u>Cost:</u> <u>\$490 plus expenses. Length of Certification: 2 years, may be renewed for \$75 and proof of 40 contact hours of WVBECC pre-approved continuing education (CEU's).</u> <u>The average cost for approved CEU's is \$20/hr plus expenses, making this expense easily reach \$800-\$1,000 annually to maintain requirements. No reimbursement is available.</u></p> <p>. <u>FACT: Since 1982 the National Board for Counselor Certification (NBCC), an independent, not-for-profit certification board, endorsed by the American Counseling Association (ACA), has set credentialing requirements for National Certification for School Counselors (NCSC) which include: Master's degree or higher in counseling, official transcript showing 48 semester or 72 quarter hours of specific graduate level coursework, two academic terms of supervised field experience in a counseling setting, two professional endorsements, two years of post-master's school counseling experience with 3,000 client contact hours with 100 hours of face to face counseling supervision, and a passing score on the National Counselor Exam (NCE), which is administered by NBCC. Cost: \$350.</u> <u>Length of Certification: 5 years, with an annual \$35 maintenance fee, may be renewed with proof of 100 contact hours of NBCC pre-approved CEU's.</u> <u>The average cost for approved CEU's is same as for LPC, as the same contact hours may be used to satisfy both renewal requirements. No reimbursement is available.</u></p> <p>. <u>FACT: Since 1982 the National Board for Counselor Certification (NBCC), an independent, not-for-profit certification board, endorsed by the American Counseling Association (ACA), has set credentialing requirements for National Certification for School Counselors (NCSC) which include: Master's degree or higher in counseling, official transcript showing 48</u></p> | <p>Barbara Blackburn Counselor Greenbrier East High</p> | |

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| 10/18/02 | Barbara Blackburn Counselor Greenbrier East High | <p>§126-67-8. Responsibility. (cont.)</p> <p>semester or 72 quarter hours of specific graduate level coursework, two academic terms of supervised field experience in a counseling setting, two professional endorsements, two years of post-master's school counseling experience with 3,000 client contact hours with 100 hours of face to face counseling supervision, and a passing score on the National Counselor Exam (NCE), which is administered by NBCC. <u>Cost: \$350.</u> <u>Length of Certification: 5 years, with an annual \$35 maintenance fee, may be renewed with proof of 100 contact hours of NBCC pre-approved CEU's.</u> <u>The average cost for approved CEU's is same as for LPC, as the same contact hours may be used to satisfy both renewal requirements. No reimbursement is available.</u></p> <ul style="list-style-type: none"> FACT: NBPTS is developing a process to offer another national certification for school counselors. So far they have set the achievement of NCSC as a prerequisite for NBPTS application. No further details are known, but the process and cost is expected to be commensurate with the NBCT one. <u>Cost: Yet to be determined. Length of Certification: Yet to be determined. Cost +some expenses may be reimbursable by WVDOE.</u> FACT: There are some school counselors who voluntarily, without increased salary incentives, aspired to hold LPC, NCSC, or both credentials. They have done so at considerable expense and time throughout their careers to maintain a high level of professional practice for their clients, the children in their schools. It seems fair to recognize and compensate presently employed WV school counselors, who currently hold such credentials (LPC and NCSC), retroactive to the date national certified teachers first achieved the national certified teacher benefit in the year 2000. 2. A school counselor is unique in a school, providing a mental health perspective to all school functions and activities. Maintaining this mental health perspective in a school setting is challenging due to the isolation from |
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| | | | §126-67-8. Responsibility. (con't.) | | |
| 10/18/02 | Barbara Blackburn Counselor Greenbrier East High | | other practicing counselors. Counseling supervision, WHICH IN NO WAY USURPS ADMINISTRATIVE SUPERVISION, provides 'standard of practice' support for school counselors to be the best counselors for WV students. | | |
| 10/18/02 | Paul E. Barcus, Jr. Superintendent Wetzel County Schools | | 8.2 - Such a policy update/revision should not be necessary on an annual basis. Every other year should suffice. | NA/0 | No changes made to the section in response to this comment. |
| 10/18/02 | Carol Thom Principal Stonewall Jackson Middle | | OK | N/+ | Positive comment about policy. |
| 10/18/02 | Sue Ann Shroyer Guidance Counselor Washington Irving Middle | | This section is excellent! DO NOT CHANGE THIS SECTION! | N/+ | Positive comment about policy. |
| 10/18/02 | Counselors Liberty High School Clarksburg, WV | | 8.1 - School counselors should be involved in the development and implementation of this program and policy. 8.2 - School counselors should be involved in formulating the assessment tool determining success of the program. | NA/0 | No changes made to the section in response to this comment. |
| | | | §126-67-9. Severability. | | |
| 10/18/02 | Lawrence M. Miller Superintendent Ohio County Schools | | The overall document is good. However, wording should have the counselor responsible for teaching the skill not worded in a manner that makes the counselor responsible for the action of the students. | NA/0 | No changes made to the section in response to this comment. |
| 10/18/02 | Carol Thom Principal Stonewall Jackson Middle | | O.K. | N/+ | Positive comment about policy. |
| 10/18/02 | Sue Ann Shroyer Guidance Counselor Washington Irving Middle | | This section is excellent and I like the part about one section being invalid does not make the entire policy invalid. DO NOT CHANGE THIS SECTION! | N/+ | Positive comment about policy. |

Shirley McGraw

From: Elizabeth Beale [ebeale@access.k12.wv.us]
Sent: Friday, October 18, 2002 2:55 PM
To: smcgraw@access.k12.wv.us
Subject: Policy 2315 comments

POLICY 2315: Comprehensive Developmental Guidance and
Counseling COMMENT/SUGGESTIONS Individual/Organization: Timothy W. Haught
Title: Principal
Magnolia High School
601 Maple Ave.
New Martinsville, WV 26155

Comments/Suggestions

126-67-5. Components of a comprehensive developmental, national standards-based guidance and counseling program that are to be addressed by county policy. If this policy revision is passed the Guidance Counselors will not be doing any work such as

1. enrolling students,
2. sending transcripts,
3. copying records, and/or
4. filing of students' records.

1. This is a necessary role and duty for Counselors so that they can meet the students and gain an early contact with their needs, goals, etc.

2. This is a necessary role and duty for Counselors since they have guided the students to graduation, kept their records and have best knowledge of the students.

3 & 4. For familiarity and confidentiality, the Counselor is the staff person most knowledgeable and able to keep records.

Note: We were unable to successfully access the Word Perfect form. EOB

RETURN COMMENTS BY October 18, 2002 TO: Shirley McGraw Secretary West Virginia
Department of Education Building 6, Room B-722 1900 Kanawha Boulevard,
East Charleston, West Virginia 25305-0330

"To infinity and beyond." - Buzz Lightyear

Barbara Blackburn

POLICY 2315: Comprehensive Developmental Guidance and Counseling

COMMENT/SUGGESTIONS

Directions: Please use this form in commenting on proposed Policy 2315.

Individual/Organization: Barbara Blackburn, MA, LPC

Title: WVSCA Government Relations Chair, Past President of WVSCA, Secondary Vice-President of American School Counseling Association, and Counselor/Greenbrier East High School.

Street Address: City/State Zip: One Spartan Lane, Lewisburg, WV 24901

| <u>Comments/Suggestions</u> |
|--|
| <u>126-67-1. General.</u> This is an incredible step in the right direction. Thank your efforts in this policy and for consideration of my comments. |
| <u>126-67-2. Purpose.</u> More emphasis needs to be put on collaboration |

Example: Ensure the school counseling programs are comprehensive in design and delivered in a systematic collaborative fashion utilizing school staff and community resources to ensuring all students can achieve success.

126-67-3. Application. 3.1 ensuring that every student can achieve success.

3.3 Fantastic!!

126-67-4. Definitions.

4.7 This still does not address the counselor's role in testing, master schedule development., etc. I believe that the appropriate/inappropriate duties list the Task Force developed should be referenced here as well as page 23 in the ASCA National Model book.

Inappropriate duties are a huge detriment to successful school counseling programs. I would like to see WV step to the forefront and use the terminology 100% of the counselors time will be spent planning and implementing National Standards programming. Anything else is inappropriate and robbing the students in WV.

4.5 Add Administrators

4.6 After help students...add...explore and make informed decisions regarding academic...

4.12 change "counselors train students" to "students are trained to assist counselors as peer... Training is a collaborative effort. It is not done solely by the school counselor.

126-67-5. Components of a comprehensive developmental, national standards-

based guidance and counseling program that are to be addressed by

county policy.

5.2 Change word in line 7 from 'assumes' to encourages parental " ADD other "and school staff"

Add

5.4 5.4. Crisis Response. The school counselor assumes a major role in developing and serving on a school/community Crisis Response Team to assist the school in readiness in case of a crisis that affects a large portion of the school population. This Crisis Response Team will be composed of the school counselor, a school administrator, students, faculty members, and community resource personnel.

Page Two - POLICY 2315: Comprehensive Developmental Guidance and Counseling

126-67-6. Comprehensive guidance and counseling program services, program

monitoring, counselor qualifications, and time distribution.

6.5. 6.5 Add School counselors spend 100% of their time planning, coordinating, and delivering a National Standards based program using the following code in utilizing their time.

6.5a = 6.5

6.5b = 6.6 Language in both of these need to be consistent! 75% of their time
25% of their time.

126-67-7. Guidance and counseling program content standards and student competencies.

126-67-8. Responsibility.

WVSCA would like to see more emphasis put on continuing education for counselors. Currently counselors are not required to pursue any additional training in school counseling, just the regular in-service that classroom teachers are mandated! We have many stagnated, out-of-date counselors delivering substandard programs to our students. We must do mandate annual training for counselors and reward those who are going above and beyond. I am suggesting an additional line items such as:

8.2. The West Virginia Board of Education endorse code changes requiring financial incentives be provided to school counselors who seek professional credentials beyond minimal WV requirements in order to assure that WV students are provided with highly trained counselors.. Nationally recognized credentials include National Certified Counselor (NCC), National Certified School Counselor (NCSC), National Board of Professional Teaching Standards (NBPTS), and Licensed Professional Counselors (LPC). These credentials require and assure that school counselors continue to receive advanced continuing education in the field of counseling to assure they are well-prepared to meet the needs of an ever-changing student population and educational system.

Please consider the following:

- **FACT: West Virginia leads the way in recognizing and compensating teachers for National Board Certification, since 2000 when the first WV teacher achieved National Certification from the National Board for Professional Teaching Standards (NBPTS), an independent, not-for-profit organization, endorsed by the NEA/WVEA and AFT/WVFT. School counselors also unequivocally support this movement as a vehicle for promoting better teaching, better learning, and better schools. COST: \$2,300 plus up to \$600**

in expenses, reimbursable through WVDOE. Length of Certification: 10 years, no continuing education requirement.

- **FACT:** West Virginia leads the way in licensing professional counselors (LPC), since 1987 with a flagship law that requires: Master's degree in counseling or closely related field, a minimum of 2,400 hours (2 years) of supervised experience beyond the master's degree by an accredited supervisor, and a passing score on the National Counselor Exam. The credential (LPC) is awarded to qualified counselors by the legislative licensing board, the WV Board of Examiners in Counseling (WVBEC). This board also reviews legal and ethical complaints from clients/consumers about licensed professional counselors, making the LPC credential reach beyond the setting of minimum standards for practice. Cost: \$490 plus expenses. Length of Certification: 2 years, may be renewed for \$75 and proof of 40 contact hours of WVBEC pre-approved continuing education (CEU's). The average cost for approved CEU's is \$20/hr plus expenses, making this expense easily reach \$800-\$1,000 annually to maintain requirements. No reimbursement is available.
 - **FACT:** Since 1982 the National Board for Counselor Certification (NBCC), an independent, not-for-profit certification board, endorsed by the American Counseling Association (ACA), has set credentialing requirements for National Certification for School Counselors (NCSC) which include: Master's degree or higher in counseling, official transcript showing 48 semester or 72 quarter hours of specific graduate level coursework, two academic terms of supervised field experience in a counseling setting, two professional endorsements, two years of post-master's school counseling experience with 3,000 client contact hours with 100 hours of face to face counseling supervision, and a passing score on the National Counselor Exam (NCE), which is administered by NBCC. Cost: \$350. Length of Certification: 5 years, with an annual \$35 maintenance fee, may be renewed with proof of 100 contact hours of NBCC pre-approved CEU's. The average cost for approved CEU's is same as for LPC, as the same contact hours may be used to satisfy both renewal requirements. No reimbursement is available.
 - **FACT:** NBPTS is developing a process to offer another national certification for school counselors. So far they have set the achievement of NCSC as a pre requisite for NBPTS application. No further details are known, but the process and cost is expected to be commensurate with the NBCT one. Cost: Yet to be determined. Length of Certification: Yet to be determined. Cost +some expenses may be reimbursable by WVDOE.
 - **FACT:** There are some school counselors who voluntarily, without increased salary incentives, aspired to hold LPC, NCSC, or both credentials. They have done so at considerable expense and time throughout their careers to maintain a high level of professional practice for their clients, the children in their schools. It seems fair to recognize and compensate presently employed WV school counselors, who currently hold such credentials (LPC and NCSC), retroactive to the date national certified teachers first achieved the national certified teacher benefit in the year 2000.
2. A school counselor is unique in a school, providing a mental health perspective to all school functions and activities. Maintaining this mental health perspective in a school setting is challenging due to the isolation from other practicing counselors. Counseling supervision, WHICH IN NO WAY USURPS ADMINISTRATIVE SUPERVISION, provides 'standard of practice' support for school counselors to be the best counselors for WV students.

126-67-9. Severability.

POLICY 2315: Comprehensive Developmental Guidance and Counseling

COMMENT/SUGGESTIONS

Directions: Please use this form in commenting on proposed Policy 2315.

Individual/Organization: Betsy Mullett

Title: Program Coordinator

Street Address: Monongalia County Schools, 13 South High Street

City/State Zip: Morgantown, WV 26501

| Comments/Suggestions |
|--|
| <u>126-67-1. General.</u> |
| <u>126-67-2. Purpose.</u> (suggested re-wording) <u>2.1 . . . and by helping assure a nurturing and orderly, safe, drug-free, violence- and harassment-free learning environment free of drugs, violence, and harassment.</u> |
| <u>126-67-3. Application.</u> |

126-67-4. Definitions.

126-67-5. Components of a comprehensive developmental, national standards-based guidance and counseling program that are to be addressed by county policy.

(suggested re-wording)

5.3 Responsive Services. . . . Responsive services may be provided in a direct format directly through . . .

Page Two - POLICY 2315: Comprehensive Developmental Guidance and Counseling

126-67-6. Comprehensive guidance and counseling program services, program monitoring, counselor qualifications, and time distribution.

(suggested change)

6.5 School counselors spend at least 75% of their time in a combination of those activities categorized as ~~direct counseling relationship with pupils and indirect services to students.~~

Rationale: Counselors spend a significant amount of time consulting / collaborating / and teaming with parents, other educators, and community service providers that is directed toward strengthening a student's support system. NOT to count these activities as part of the 75% will decrease time spent in these modes. Such "indirect services" are not classified under either the 75% or the 25% guidelines and need to be.

126-67-7. Guidance and counseling program content standards and student competencies.

126-67-8. Responsibility.

126-67-9. Severability.

RETURN COMMENTS BY October 18, 2002 TO:

Shirley McGraw

Secretary

West Virginia Department of Education

Building 6, Room B-722

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

Shirley McGraw

From: Judd Ashcraft [tashcraf@access.k12.wv.us]
Sent: Friday, October 18, 2002 2:36 PM
To: smcgraw@access.k12.wv.us
Subject: 2315

Directions: Please use this form in commenting on proposed Policy 2315.

Individual/Organization: North Marion High School

Title: Att. Principal

Street Address: City/State Zip: RR1 Box 100 Farmington WV 26571

Comments/Suggestions

126-67-1. General. On the High School level one essential role that counselors have been involved in for many years is student scheduling. This policy seems to be another attempt to prevent counselors from doing the "nuts and bolts", "paperwork", "data entry" tasks that we all have to do as teachers and administrators. An unfunded "time" mandate if I ever saw one. If you were really serious about student direct services you would work to increase the number of professionals per 1000 formula. And where are the mandated counselor student ratios? Our parents want an educational guidance counselor to help with course selection and academic success, graduation requirements, scholarships, and Financial Aid, not a career instructors. This sounds like a "its not my job man" policy that I am sure will be used by many unproductive counselors who say they need 8 hours to serve 8 students. And what is this "no more than 25% of their time on counselor related administrative duties" stuff. Am I to keep track of time spent counseling students verses doing administrative duties. What is a good expectation; say 10 min per kid per problem for counseling and 3 min per kid for record keeping. Are you requiring a WVEIS operator for each counseling department? The days of specialization where teachers only teach, counselors only council and administrators administrate have been tosses aside long ago by previous State Policies. You can't go back without eliminating something not just shifting to someone else. The plate is full.! There, I feel better.

POLICY 2315: Comprehensive Developmental Guidance and Counseling

COMMENT/SUGGESTIONS

Directions: Please use this form in commenting on proposed Policy 2315.

Individual/Organization: Mr. Lawrence M. Miller, Ohio County Schools

Title: Superintendent

Street Address: 2203 National Road **City/State Zip:** Wheeling, WV 26003

| Comments/Suggestions |
|--|
| 126-67-1. General. |
| 126-67-2. Purpose. |
| 126-67-3. Application. |
| 126-67-4. Definitions. |
| 126-67-5. Components of a comprehensive developmental, national standards-based guidance and counseling program that are to be addressed by county policy. |

Policy 2315: Comprehensive Developmental Guidance and Counseling

COMMENT/SUGGESTIONS

126-67-1. General

126-67-2. Purpose

126-67-3. Application

The use of "proactive, preventive" is of great importance.

126-67-4. Definitions.

This section is well defined and emphasizes the duties of the counselor.

126-67-5. Components of a comprehensive developmental, national standards-based guidance and counseling program that are to be addressed by county policy.

126-67-6. Comprehensive guidance and counseling program services, program monitoring, counselor qualifications, and time distribution.

126-67-7. Guidance and counseling program content standards and student competencies.

This section lists attitudes, knowledge, and skills that are beneficial for students to **BE TAUGHT**, however, these standards are difficult to assess in counseling. It would be better to state that **STUDENTS WILL LEARN TO**, rather than simply saying that the students will. How will you evaluate? It will be extremely difficult, if possible at all, to measure the level of success for these competencies. How will a counselor be judged on efficiency and progress in all these areas?

126-67-8. Responsibility.

It appears by the wording that the counselor is made responsible for the students behavior rather than the task of teaching the skill. How can a counselor be responsible for a student's action, example 7.3.1a. It should be stated "students will be taught how to develop a positive attitude.

126-67-9. Severability.

The overall document is good. However, wording should have the counselor responsible for teaching the skill not worded in a manner that makes the counselor responsible for the action of the students.

EDISON JUNIOR HIGH SCHOOL

OFFICE OF THE PRINCIPAL, 1201 HILLCREST ST., PARKERSBURG, WV 26101
(304) 420-9525

FAX COVER SHEET

FAX NUMBER: 1-304-420-9527

PLEASE DELIVER IMMEDIATELY TO THE PROPER PERSON(S)

TO: Shirley Mc Graw

FAX NUMBER: 304-558-0048

FROM: Viola Huff

DATE: 10/18/02

TIME: 2:55

NUMBER OF PAGES (INCLUDING THIS COVER SHEET): 2

COMMENTS: _____

If you do not receive all pages, please call 1-304-420-9525.

126-67-2. Purpose.

126-67-3. Application.

I don't know any job in education that doesn't entail some type of clerical responsibilities. From the superintendant's desk to the principal's desk, everyone is working overtime to keep up. My Counselor doesn't do any administrative tasks. She counsel students individually, and administers the Writing Assessment, the Explore and the SAT 9 tests.

126-67-5. Components of a comprehensive developmental, national standards-

based guidance and counseling program that are to be addressed by county policy.

WETZEL COUNTY SCHOOLS

333 Foundry Street
New Martinsville, W.Va. 26155
Telephone (304) 455-2441
Fax No. (304) 455-3446



FAX COVER SHEET

TO: Shirley McGraw
FAX NUMBER: 1-304-558-1613
FROM: Butch Barcus
DATE: 10-17-02

NUMBER OF PAGES: [including this cover page]: 4

NOTES:

POLICY 2315: Comprehensive Developmental Guidance and Counseling

COMMENT/SUGGESTIONS

Directions: Please use this form in commenting on proposed Policy 2315.

Individual/Organization: Paul E. Barcus, Jr.
Wetzel County Schools
Title: Superintendent

Street Address: City/State Zip: 333 Foundry Street
New Martinsville, WV 26155

| Comments/Suggestions |
|----------------------|
| 126-67-1. General. |

126-67-2. Purpose.

126-67-3. Application.

126-67-4. Definitions.

4.7 - the items listed under the "do not include" section at the end will cause additional "mandated but unfunded" functions of Counselors cannot do such duties. Volunteers and student workers cannot do these jobs due to the confidentiality of certain records. Counselors can, should, and must be able to spend part of their time in

126-67-5. Components of a comprehensive developmental, national standards-based guidance and counseling program that are to be addressed by county policy.

these areas.
4.11 - the above can and should be considered as part of the implementation of the program

Page Two - POLICY 2315: Comprehensive Developmental Guidance and Counseling

126-67-6. Comprehensive guidance and counseling program services, program

monitoring, counselor qualifications, and time distribution.

6.1 - my comments on 4.7 can and should be considered as "System Support" or "Individual Student Planning".

126-67-7. Guidance and counseling program content standards and student competencies.

126-67-8. Responsibility.

8.2 - such a policy update/revision should not be necessary on an annual basis. Every other year should suffice.

126-67-9. Severability.

Bridgeport Middle School

John Branham - Principal

Tom Brown - Vice Principal

Wendy Imperial - Counselor

www.wvonline.com/bms/bms.htm

413 Johnson Avenue
Bridgeport, WV 26330



Nancy Petitto - Secretary

Paula Dennison - Secretary

Fax: 304-842-6275

Phone: 304-842-6251

West Virginia Department of Education
1900 Kanawha Boulevard East
Charleston, WV 25305

To Whom It May Concern:

The last sentence in section 126-67-4.7 of the proposed Policy 2315 – Comprehensive Developmental Guidance Policy concerns me. I want to make it very clear I am very supportive of the plight of school counselors and the volume of work they have. Our counselor is the lifeblood of our school. Without her significant input, work ethic, and individual counseling of our students, we would not be where we are today – a thriving, student oriented, academically successful, and safe school. The problem is not the clause but the manner in which we are to accomplish these tasks for the counselor with our present staff limitations. One of our full time secretaries was reduced to half time and she works with the lunch program and its many reports plus answering the phone and dealing with the public as they enter the office. Our other secretary is the accountant and is swamped with financial matters, tending to staff needs as well as answering the phone and dealing with the public. To require one them to do filing would take them out of the office and cause a significant overload to already short-handed secretaries.

Is there a provision for the increase in clerical staff needed to accomplish these tasks? We do handle all data entry and assist in the duplication of documents and materials however. Please consider this when you look at Policy 2315 and provide us assistance or provide stipends for counselors or other clerical help to accomplish these tasks.

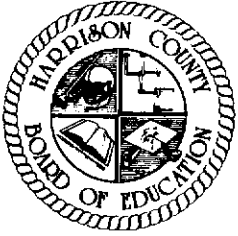
Counseling-related administrative activities do not include: activities of a clerical nature such as data entry, the filing of student records and forms, and the duplication of documents and materials for distribution.

Thank you for your consideration on this matter.

Sincerely,

A handwritten signature in cursive script that reads "John F. Branham". The signature is written in black ink and is positioned above the printed name.

John F. Branham



DR. CARL H. FRIEBEL, JR.
Superintendent

HARRISON COUNTY SCHOOLS

408 E.B. SAUNDERS WAY
POST OFFICE BOX 1370
CLARKSBURG, WEST VIRGINIA 26302-1370
(304) 624-3325
FAX (304) 624-3361

BOARD OF EDUCATION
SALLY J. CANN, *President*
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JAMES E. BENNETT
DOUG GRAY
JAMES L. REASER

October 17, 2002

Shirley McGraw, Secretary
West Virginia Department of Education
Building 6, Room B-722
1900 Kanawha Boulevard, East
Charleston, WV 25305-0330

Dear Ms. McGraw:

Attached are comments relative to Policy 2315: Comprehensive Developmental Guidance and Counseling. I trust that our comments will be given your every professional courtesy and consideration.

Thanking you in advance, I am,

Sincerely yours,

A handwritten signature in black ink, appearing to read "Carl H. Friebel, Jr.", written in a cursive style.

Carl H. Friebel, Jr., Ed.D.
Superintendent

CHF/eab

Cc: William N. Ashcraft, Assistant Superintendent
File Copy

POLICY 2315: Comprehensive Developmental Guidance and Counseling

Comment/Suggestions

126-67-4. Definitions

Exempting counselors from "data entry, filing of student records and forms, and duplicating documents, materials" etc. presents two significant problems:

1. If counselors are exempted, how are we to explain to teachers and administrators that they must continue doing data entry, filing, and maintaining student records and grades and attendance and duplicating all kinds of things for the classroom, etc.? In most buildings, all professionals are involved daily in those activities that counselors will now be exempt should this policy be adopted as written.
2. Assuming that the current verbiage remains, school secretaries who are already taxed will undoubtedly be given the bulk of the work that counselors are protected from doing. I don't know very many secretaries who aren't really busy keeping up with their own work loads.

126-67-6. Comprehensive guidance and counseling program services, program monitoring, counselor qualifications, and time distribution:

6.5 and 6.6 This policy is defining 100% of the counselors' day. There are many activities that occur during a school day that go beyond the typical definition of teacher, counselor, and administrator. Hall duty, lunch duty, bus duty, and the various and sundry responsibilities that make a school function have been shared by all professional staff members. It appears that counselors will no longer share in these responsibilities.

Fiscal note worksheet

Please realize that the implementation of this policy will not be free. I believe county school systems will have to give strong consideration to hiring additional clerks to manage these responsibilities. It is unfortunate that new hirings will be occurring simultaneously with the decrease in county funds as the result of the anticipated governor's budget cut.

POLICY 2315: Comprehensive Developmental Guidance and Counseling

COMMENT/SUGGESTIONS

Directions: Please use this form in commenting on proposed Policy 2315.

Individual/Organization:

Title:

Street Address: City/State Zip:

| Comments/Suggestions |
|-------------------------------|
| 126-67-1. General. |
| 126-67-2. Purpose. |
| 126-67-3. Application. |

126-67-4. Definitions.

126-67-5. Components of a comprehensive developmental, national standards-

based guidance and counseling program that are to be addressed by county policy.

Page Two - POLICY 2315: Comprehensive Developmental Guidance and Counseling

126-67-6. Comprehensive guidance and counseling program services, program

monitoring, counselor qualifications, and time distribution.

126-67-7. Guidance and counseling program content standards and student competencies.

126-67-8. Responsibility.

126-67-9. Severability.

STONEWALL JACKSON MIDDLE SCHOOL

812 Park Avenue

Charleston, WV 25302

Phone: 304 348-6123 Fax: 304 348-1999



Principal: Carol Thom

Assistant Principal: Ervina Chinnery, Lowell Harris

Counselor: Julie Kirk, Debbie Baldwin,

Secretary: Doris Engelmann

FAX COVER SHEET

Page 1 of 4

Date: 10/17/02

To: _____

Attention: Shirley McGraw

From: Carol Thom

Message: _____

126CSR67

measures of success for student competencies in each of the three areas of academic, career and personal/social development.

§126-67-9. Severability.

9.1. If any provision of this rule or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of this rule.

POLICY 2315: Comprehensive Developmental Guidance and Counseling

COMMENT/SUGGESTIONS

Directions: Please use this form in commenting on proposed Policy 2315.

Individual/Organization: CAROL THOM---STONEWALL JACKSON MIDDLE SCHOOL

Title: PRINCIPAL

Street Address: 812 PARK AVENUE

City/State Zip:

CHARLESTON, WV. 25302

Comments/Suggestions

126CSR67

126-67-6. Comprehensive guidance and counseling program services, program monitoring, counselor qualifications, and time distribution.

I WOULD REDUCE THE GUIDANCE CURRICULUM PERCENTAGE TO ABOUT 20% AND INCREASE THE INDIVIDUAL STUDENT PLANNING PERCENTAGE TO ABOUT 30%. MIDDLE AGE STUDENTS NEED MORE ONE ON ONE SUPPORT.

126-67-7. Guidance and counseling program content standards and student competencies.

AMBITIOUS! IDEALISTIC! BUT MUCH NEEDED.

126-67-8. Responsibility.

OK

126-67-9. Severability.

OK

RETURN COMMENTS BY October 18, 2002 TO:

Shirley McGraw

Secretary

West Virginia Department of Education

Building 6, Room B-722

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

126CSR67

126-67-1. General.

OK

126-67-2. Purpose.

GOOD!

126-67-3. Application.

GOOD!

126-67-4. Definitions.

4.7 COUNSELING-RELATED ADMINISTRATIVE ACTIVITIES: IF YOU COMPLETELY ELIMINATE DATA-ENTRY, DUPLICATION OF FORMS, AND FILING, I HOPE YOU WILL FUND CLERICAL STAFF FOR COUNSELORS. SOMEONE WILL HAVE TO TAKE UP THE SLACK, AND THERE IS NO ONE AVAILABLE TO DO IT AT THIS TIME. THIS IS, IN MY OPINION, NOT REALISTIC UNLESS YOU PROVIDE THE ADDITIONAL HELP REQUIRED.

126-67-5. Components of a comprehensive developmental, national standards-based guidance and counseling program that are to be addressed by county policy.

GOOD!

**POLICY 2315: Comprehensive Developmental Guidance and
Counseling**

COMMENT/SUGGESTIONS

Directions: Please use this form in commenting on
proposed Policy 2315.

Individual/Organization: *Wendy Imperial, MA, LPC, NCC*

Title: *School Counselor-
Bridgeport Middle School, Harrison County
Counselor Educator - WVU and Marshall U*

Street Address: City/State Zip:
413 Johnson Avenue, Bridgeport, WV 26330

Comments/Suggestions

126-67-1. General.

First and foremost, I am thrilled to see the interest in the school counseling arena. This policy is a clear definition/description of our role as school counselors. I am blessed to be at a middle school that has a supportive administration that enables me to "be here for the students". Paperwork is an enormous task, being the only counselor with an enrollment over 650 students. I am proud to be an advocate (and sometimes the only one) for each child in my building.

As a counseling educator, the definitions help support graduate programs that encourage use of theory and creative techniques in

direct counseling including individual, group, and developmental guidance activities.

It may take years for county systems to adequately implement this policy as it will require reduction of paperwork done by counselors. BUT, implementation is an administrative problem and we must not defeat a well-written counseling policy based on concerns counties have on its implementation!

126-67-2. Purpose.

126-67-3. Application.

126-67-4. Definitions.

126-67-5. Components of a comprehensive developmental, national standards- based guidance and counseling program that are to be addressed by county policy.

Page Two - POLICY 2315: Comprehensive Developmental Guidance and Counseling

126-67-6. Comprehensive guidance and counseling program services, program monitoring, counselor qualifications, and time distribution.

My only concern with this distribution of counseling activities is the inequity of enrollment per counselor. Our county has one counselor per middle school regardless of school size. Enrollment in our six middle schools ranges from under 200 to over 650 students. It would be impossible for me to provide necessary "response services" to my 650+ students if I am "forced" to spend

25-35% of my day in a classroom. Developmental guidance activities are often provided through our advisor/advisee period (under the middle school concept) as my time availability makes classroom guidance a luxury for me, not a commonality! I say "forced" in the above sentence because I feel that the interpretation of this chart may provide administrators the leverage to use counselors as teachers to help alleviate "crunches" in their related arts scheduling. (This is already being done in one of our middle schools.)

126-67-7. Guidance and counseling program content standards and student competencies.

126-67-8. Responsibility.

COMMENT/SUGGESTIONS

Directions: Please use this form in commenting on proposed Policy 2315.

Individual/Organization: Sue Ann Shroyer

Title: Guidance Counselor - Washington Irving Middle School

Street Address: Route #1, Box 421 City/State Zip: Grafton, WV 26354

| Comments/Suggestions |
|--|
| <p>126-67-1. General. This section is very positive and specific--replaces a vague and non-specific policy.</p> <p><u>DO NOT CHANGE THIS SECTION!</u></p> |
| <p>126-67-2. Purpose. This section is very specific and to the point.</p> <p><u>DO NOT CHANGE THIS SECTION.</u></p> |
| <p>126-67-3. Application. This section finally has some "teeth" in addressing what counselors will do and the role they will play in the school setting.</p> <p><u>DO NOT CHANGE THIS SECTION!</u></p> |
| <p>126-67-4. Definitions. This entire section is excellent!</p> <p>4.7 Excellent - specifies what counselors should <u>not</u> do 4.11 Excellent - especially the definition of non-counseling</p> <p><u>DO NOT CHANGE THIS SECTION!</u></p> |
| <p>126-67-5. Components of a comprehensive developmental, national standards-based guidance and counseling program that are to be addressed by county policy.</p> <p>This section will be a positive influence in all schools because all students will now receive these national/state standards. Counselors at all levels will be able to build on standards which should have been learned in the lower grades.</p> <p><u>DO NOT CHANGE THIS SECTION!</u></p> |

Page Two - POLICY 2315: Comprehensive Developmental Guidance and Counseling

126-67-6. Comprehensive guidance and counseling program services, program monitoring, counselor qualifications, and time distribution.

CHANGE!!
This revised policy should have included a student to counselor ratio of 250 to 1. Also, the suggested ratios of how a counselor's time should be spent should be made specific. This could allow a ~~weakness in a~~ principal or county office person to manipulate these percentages and cause a weakness in the program.

126-67-7. Guidance and counseling program content standards and student competencies.

This section is very specific, positive and encompasses a wide range of areas.

DO NOT CHANGE THIS SECTION!

126-67-8. Responsibility.

This section is excellent!

DO NOT CHANGE THIS SECTION!

126-67-9. Severability.

This section is excellent and I like the part about one section being invalid does not make the entire policy invalid.

DO NOT CHANGE THIS SECTION!

RETURN COMMENTS BY October 18, 2002 TO:

Shirley McGraw
Secretary
West Virginia Department of Education
Building 6, Room B-722
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

SUE ANN SHROYER

Page #2

POLICY 2315: Comprehensive Developmental Guidance and Counseling

COMMENT/SUGGESTIONS

Directions: Please use this form in commenting on proposed Policy 2315.

Individual/Organization:

C/O LIBERTY HIGH SCHOOL COUNSELORS
ONE MOUNTAINEER DRIVE
CLARKSBURG, WV 26301

HARRISON COUNTY HIGH SCHOOL COUNSELORS: MICKEY GERBA, BARBARA JUDY, ISAAC MAXWELL, BETH MOORE, SUE MILLER, MARTHA CAPUTO, PAULA ALTMAN, LOUIE NARDELLI

| Comments/Suggestions |
|---|
| 126-67-1. General. |
| 126-67-2. Purpose. |
| 126-67-3. Application. |
| <p>126-67-4. Definitions.</p> <p>4.3 – “STRUCTURED DEVELOPMENTAL LESSONS” AND “PRESENTED SYSTEMATICALLY” – THIS DELIVERY MUST BE FLEXIBLE, MUST INVOLVE ALL SCHOOL PERSONNEL AS STATED IN 3.3, AND MUST NOT BE AN ASSIGNED CLASS ON THE SCHOOLS’ MASTER SCHEDULES FOR THE COUNSELORS BECAUSE OF COUNSELOR INTERVENTION THAT IS NEEDED IN STUDENT CRISES OR PROBLEMS THAT OCCUR ON A DAILY BASIS.</p> <p>4.7 – <u>WE AGREE</u> THAT DATA ENTRY AND FILING ARE NOT COUNSELOR-RELATED ACTIVITIES.</p> <p>4.13 – PROGRAM AUDIT – MUST INVOLVE SCHOOL COUNSELORS IN DEVELOPING THE AUDIT ASSESSMENT TOOL.</p> |
| <p>126-67-5. Components of a comprehensive developmental, national standards-</p> <p>based guidance and counseling program that are to be addressed by county policy.</p> |

5.1 – “THE GUIDANCE CURRICULUM CONSISTS OF STRUCTURED DEVELOPMENTAL LESSONS.....” - THIS MUST HAVE A FLEXIBLE DELIVERY AND NOT ASSIGNED AS A SPECIFIC CLASS PERIOD TO SCHOOL PERSONNEL/COUNSELORS.

“.....IS PRESENTED SYSTEMATICALLY” – AGAIN THERE HAS TO BE FLEXIBILITY SINCE COUNSELORS HAVE ISSUES ARISE UNEXPECTEDLY AND MUST DEAL WITH A VARIETY OF SITUATIONS SUCH AS ENROLLMENT, WITHDRAWALS, PERSONAL STUDENT ISSUES, TESTING, ETC.

Page Two - POLICY 2315: Comprehensive Developmental Guidance and Counseling

126-67-6. Comprehensive guidance and counseling program services, program

monitoring, counselor qualifications, and time distribution.

6.1 – “CLASSROOM GUIDANCE” – MUST BE FLEXIBLE AND NOT ASSIGNED IN MASTER SCHEDULE.

6.7 – DISTRIBUTION OF COUNSELOR TIME – GUIDANCE CURRICULUM PERCENTAGE OF TIME FOR HIGH SCHOOL SHOULD NOT BE MORE THAN 10 PERCENT.

126-67-7. Guidance and counseling program content standards and student competencies.

126-67-8. Responsibility.

8.1 – SCHOOL COUNSELORS SHOULD BE INVOLVED IN THE DEVELOPMENT AND IMPLEMENTATION OF THIS PROGRAM AND POLICY.

8.2 – SCHOOL COUNSELORS SHOULD BE INVOLVED IN FORMULATING THE ASSESSMENT TOOL DETERMINING SUCCESS OF THE PROGRAM.

126-67-9. Severability.

RETURN COMMENTS BY October 18, 2002 TO:

Shirley McGraw

Secretary

West Virginia Department of Education

Building 6, Room B-722

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

West Virginia Department of Education

1900 Kanawha Boulevard East

Charleston, WV 25305

(Phone List by Topics) (Staff Phone and Email by Name) (School Directory)

For suggestions, questions, problems contact the webmaster
Please read our disclaimers

12 Warren Place
Charleston, WV 25302

September 19, 2002

TO: Karen Huffman
West Virginia Department of Education
Building 6
Capitol Complex
Charleston, WV 25305

FROM: Billie Davis



RE: COMMENTS: Policy 2315: **COMPREHENSIVE DEVELOPMENTAL GUIDANCE
AND COUNSELING**

After studying Policy 2315, which is an excellent move toward improving Counseling Services to students in the public schools of West Virginia, I strongly suggest that there be, throughout the policy, very specific language indicating that developmental strategies need to be created in a collaborative team effort involving all Counselors within each high school attendance area: elementary, middle/junior high, senior high.

Elementary Counselors need to know what their students will face at the next level and need to be able to prepare the receiving middle/junior high Counselors with information about the Developmental Guidance these students already have experienced. A smooth transition is vital to the success of these students.

Similar transition activities and information are needed between middle/junior high Counselors and the receiving senior high Counselors. ALL of these Counselors need to know each other and spend time together preparing for their students.

Appropriate specific language might include "Elementary, middle/junior high and senior high school Counselors working in the same high school attendance area are to develop their k-12 Comprehensive Guidance and Counseling Plans together". Since repetition works, such language might be added to 3.1, 3.2, 3.3, 4.2, 4.3, 4.4, 4.14, 5.2, 5.4, 7.1.

This policy will mean nothing unless it is enforced.



COLLINS MIDDLE SCHOOL

601 JONES AVE
OAK HILL WV 25901
PHONE (304) 469-3711
FAX (304) 465-1352



A WEST VIRGINIA BLUE RIBBON SCHOOL

September 27, 2002

Shirley McGraw, Secretary
Office of Student Services and Assessment
West Virginia Department of Education
Capitol Building 6, Room 722
1900 Kanawha Boulevard, East
Charleston, WV 25305

Dear Ms. McGraw:

In regard to the following:

Agency: West Virginia Board of Education
Title Number: 126
Rule Type: Legislative
Cite Authority: W.Va. Const., Article XII, § 2; W.Va. Code
§ 18-2-5 and § 18-5-18b.

Amendment to an existing rule: yes

Series Number being amended: 67

Title of Rule being amended: Comprehensive Developmental Guidance and
Counseling (2315)

I suggest that testing and all testing-related activities be included under 4.7—
Counseling - related administrative activities.

Thank you for your consideration to this suggestion.

Sincerely,

Vicki Lagos
Vicki Lagos
Counselor

Shirley McGraw

From: Barb Judy [bmjudy@access.k12.wv.us]
Sent: Monday, September 30, 2002 8:14 AM
To: smcgraw@access.k12.wv.us
Subject: policy 2315

I am a counselor at Bridgeport High School with over 25 years of service. This policy that you are proposing is excellent. It truly does address our needs and makes it easy to define our job to others.

I couldn't figure out a way to make the comment form into an email to you so sending my response this way.

Barb

Directions: Please use this form in commenting on proposed Policy 2315.

Individual/Organization:

Louis W. Fratto / Washington Irving Middle School

Title:

Principal

Street Address: City/State Zip:

443 Lee Ave Clarksburg WV 26301

Comments/Suggestions

126-67-1. General.

126-67-2. Purpose.

126-67-3. Application.

126-67-4. Definitions. 4.7 I want to object to what is not included in the Counseling-related Admin. Activities. What this document if passed will create is a major problem in getting students registered, transcript sent to other schools and maintaining student records. This will not be in the best interest of children. We are asked to cut back 10% by the governor and this will be reflected in Clerical personnel. It is extremely important that the Counselor have hands on personal approach with student involvement.

POLICY 2315: Comprehensive Developmental Guidance and Counseling

COMMENT/SUGGESTIONS

Directions: Please use this form in commenting on proposed Policy 2315.

Individual/Organization: MUSSELMAN MIDDLE

Title: Principal

Street Address: 8784 WINCHESTER AVE. City/State Zip: Bunker Hill, W.V.
25413

| Comments/Suggestions |
|--|
| 126-67-1. General. |
| 126-67-2. Purpose. |
| 126-67-3. Application. |
| 126-67-4. Definitions. <i>4.7 Counseling-related administrative activities</i> <i>If a counselor is not permitted to file some student records or make copies of student records. Then who is to perform these activities? Do you not realize that we do not have sufficient clerical staff to perform these duties. The do not include part of 4.7 needs to be struck.</i> |
| 126-67-5. Components of a comprehensive developmental, national standards-based guidance and counseling program that are to be addressed by county policy. |

measures of success for student competencies in each of the three areas of academic, career and personal/social development.

§126-67-9. Severability.

9.1. If any provision of this rule or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of this rule.

POLICY 2315: Comprehensive Developmental Guidance and Counseling

COMMENT/SUGGESTIONS

Directions: Please use this form in commenting on proposed Policy 2315.

Individual/Organization: JOHN ADAMS MIDDLE SCHOOL

Title: THOMAS D. KIDD - PRINCIPAL

Street Address: 2002 PRESIDENTIAL DR. **City/State Zip:** CHAS, WV 25314

Comments/Suggestions

See second page -

126-67-1. General.**126-67-2. Purpose.****126-67-3. Application.**

126-67-4. Definitions. 4.7. I strongly disagree with the last sentence of this section. Principals and counselors need to develop their own professional work relationship and not have every little detail defined by policy. In addition counseling positions are funded by levy and not state code. Over regulation does not support a healthy and conducive work environment. I was ask you to delete the last sentence of 4.7

126-67-5. Components of a comprehensive developmental, national standards-based guidance and counseling program that are to be addressed by county policy.

Page Two - POLICY 2315: Comprehensive Developmental Guidance and Counseling

OVER AN SEVERAL PARTS OF THIS POLICY ARE WELL WRITTEN AND SERVE A PRACTICAL APPROACH TO COUNSELING SERVICES

126-67-6. Comprehensive guidance and counseling program services, program monitoring, counselor qualifications, and time distribution.

126-67-7. Guidance and counseling program content standards and student competencies.

126-67-8. Responsibility.

126-67-9. Severability.

RETURN COMMENTS BY October 18, 2002 TO:

Shirley McGraw

Secretary

West Virginia Department of Education

Building 6, Room B-722

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330