



**Karen B. Salmon, Ph.D.**  
State Superintendent of Schools

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**TO:** Members of the State Board of Education

**FROM:** Karen B. Salmon, Ph.D.

**DATE:** June 25, 2019

**SUBJECT:** COMAR 13A.05.05.02  
*School Counseling Program*  
**ADOPTION**

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**PURPOSE:**

The purpose of this item is to request that the State Board adopt COMAR 13A.05.05.02– *School Counseling Program*.

**REGULATION PROMULGATION PROCESS:**

Under Maryland law, a state agency, such as the State Board, may propose a new or amended regulation whenever the circumstances arise to do so. After the State Board votes to propose such a regulation, the proposed regulation is sent to the Administrative, Executive, and Legislative Review (AELR) Committee for a 15-day review period. If the AELR Committee does not hold up the proposed regulation for further review, it is published in the Maryland Register for a 30-day public comment period. At the end of the comment period, Maryland State Department of Education (MSDE) staff reviews and summarizes the public comments. Thereafter, MSDE staff will present a recommendation to the State Board of Education to either: (1) adopt the regulation in the form it was proposed; or (2) revise the regulation and adopt it as final because the suggested revision is not a substantive change; or (3) revise the regulation and re-propose it because the suggested revision is a substantive change. At any time during this process, the AELR Committee may stop the promulgation process and hold a hearing. Thereafter, it may recommend to the Governor that the regulation not be adopted as a final regulation or the AELR Committee may release the regulation for final adoption.

**BACKGROUND:**

In 2012, the American School Counseling Association (ASCA) approved a formal model for school counseling programs to provide a framework for uniformity for school counseling programs across the country. This model for school counseling programs was termed the ASCA National Model and is comprehensive in scope, preventive in design, and developmental in nature. The school counseling program is a data driven program based on standards in three major domains-academic, career, and personal/social. The components are designed to promote and enhance learning processes for all students through both direct and indirect counseling services to students.

The framework developed by ASCA incorporates four components of comprehensive school counseling programs: foundation, management, delivery, and accountability. These four components address program strategies such as program focus, student competencies, professional competencies, assessments, advisories, use of data, action plans, direct and indirect services to students, and accountability.

The current COMAR 13A.05.05.02 *School Counseling Programs* originally became effective July 1, 1985 and was amended effective February 23, 1987 and again amended December 1, 2008. The proposed update incorporates the 2012 ASCA National Model as a framework for school counseling programs in Maryland. Stakeholder feedback on the proposed update has been obtained from the Maryland School Counseling Association, school counseling supervisors, representation from Directors of Student Services, and school principals. All feedback from these stakeholder groups was incorporated into the proposed regulations.

### **EXECUTIVE SUMMARY:**

The proposed regulations define, update, and clarify the requirements for school counseling programs to support and unify the role of school counselors in students' academic, career, and personal/social performance to enhance school success based upon the ASCA National Model. The regulations support the role of school counselors in working with families, school administrators, educators, and other professionals to create supportive learning and social environments for all students. Using the skills of leadership, advocacy, and collaboration, coupled with strong professional ethical guidelines, the professional school counselor can develop a program that reflects the ASCA National Model to implement strong school counseling programs across the State of Maryland.

The State Board reviewed the regulations and granted permission to publish at the January 22, 2019, State Board Meeting. The regulation was published in the Maryland Register from April 12, 2019, to May 13, 2019. Twenty-one comments were received from school counselors, school counseling educators, and a local school system (See Attachments II and III). Nineteen of the comments advocated adoption of the proposed regulation. One comment requested that the word "planning" be replaced by the word "counseling" in the regulation. The MSDE modified this suggestion and indicated that the word "counseling" be inserted after the word "planning" in COMAR 13A.05.05.02A(10) and 13A.05.05.02.B(3)(a)(ii) to reflect the dual nature of school counseling which provides both planning and counseling services. In review with counsel, this addition is not substantive.

The same request included changing the word "recommended" in direct services to "shall provide" in COMAR 13A.05.05.02B(3)(a). That comment was not accepted. Another comment suggested a change in wording in the section on direct and indirect services in COMAR 13A.05.05.02B(3)(a) and (b). That comment was not accepted for change. The regulation was created based on the ASCA National Model but was not designed to incorporate the ASCA National Model by reference in totality. The MSDE chose to enhance and strengthen the time spent on direct services to students in Maryland public schools. The MSDE will communicate with the state supervisors of school counseling to support the implementation of COMAR 13A.05.05.02.

**ACTION:**

Request that the State Board adopt COMAR 13A.05.05.02– *School Counseling Program*.

Attachments:

COMAR 13A.05.05.02– *School Counseling Program*  
Public Comment Summary  
Public Comments

**Title 13A**  
**STATE BOARD OF EDUCATION**  
**Subtitle 05 SPECIAL INSTRUCTIONAL PROGRAMS**

**13A.05.05 Programs of Pupil Services**

**.02 School Counseling Program.**

A. *The School Counseling Program is a coordinated data driven program of counseling, consulting, and informational services for students in grades K—12 that:*

- (1) *Promotes student academic success and well-being;*
- (2) *Enhances awareness of mental health and promotes positive, healthy behaviors;*
- (3) *Provides school-based prevention and universal and targeted interventions for students with mental health and behavioral health concerns;*
- (4) *Is comprehensive in scope, preventative in design, and developmental in nature;*
- (5) *Is aligned with school system goals and objectives;*
- (6) *Is an integral component of the school's program and mission;*
- (7) *Promotes systemic change through the use of leadership skills, advocacy, and collaboration;*
- (8) *Promotes student achievement;*
- (9) *Provides equitable access to a rigorous education for all students;*
- (10) *Provides students with individual and group planning/counseling addressing academic, career, and social/emotional needs;*
- (11) *Identifies the knowledge and skills all students will acquire to promote college and career readiness;*
- (12) *Is delivered to all students in a systemic fashion;*
- (13) *Addresses the needs of the whole child so that each student has the opportunity to be healthy, safe, engaged, supported, and challenged for long-term success;*
- (14) *Is monitored and reviewed through accountability systems; and*
- (15) *Is provided by a State-credentialed school counselor as defined in COMAR 13A.12.03.02.*

B. *The school counseling program shall be formed around the following components:*

- (1) *Foundation components, including:*
  - (a) *Program focus;*
  - (b) *Student competencies; and*
  - (c) *Professional competencies;*
- (2) *Management components, including, but not limited to:*
  - (a) *School counselor competency and school counseling program assessments;*
  - (b) *Annual agreements or annual plan;*
  - (c) *Advisory councils;*
  - (d) *Use of data to measure program implementation and outcomes to promote systemic change such as use of time assessments, calendars, and student academic measures; and*
  - (e) *Curriculum, small group, and closing the gap action plans;*
- (3) *Delivery components, including direct and indirect services to students that focus on students' academic, career, and social/emotional needs, as follows:*
  - (a) *Direct services, recommended to be 80 percent of school counselor services, are services between school counselors and students that are in person or virtual interactions that include, but are not limited to:*
    - (i) *School counseling core curriculum;*
    - (ii) *Individual student planning/counseling; and*
    - (iii) *Responsive services; and*
  - (b) *Indirect services, recommended to be 20 percent of school counselor services, are services for students that result from the school counselor's interactions with others that include, but are not limited to:*
    - (i) *Referrals for assistance;*
    - (ii) *Consultation and collaboration with families, teachers and other educators, community organizations, and other stakeholders;*
    - (iii) *Participation as members of the educational team; and*
    - (iv) *Other activities that fall in line with the appropriate duties of a school counselor as detailed in this regulation; and*
  - (4) *Accountability components, including the use of school counseling program data to demonstrate the impact of the school counseling program on students and the school in measureable terms that include, but are not limited to:*
    - (a) *Student attendance data;*
    - (b) *Student achievement data; and*
    - (c) *Student behavior data.*

C. *School counseling services shall be aligned with the following domains:*

- (1) *Academic development intended to help students:*

*(a) Acquire the attitudes, knowledge, and skills that contribute to effective learning in school and across their life span;*

*(b) Complete school with the academic preparation essential to choose from a wide range of substantial post-secondary options, including college; and*

*(c) Understand the relationship of academics to the world of work and to life at home and in the community;*

*(2) Career development intended to help students:*

*(a) Acquire the skills to investigate the world of work in relation to their knowledge of self in order to make informed career decisions;*

*(b) Employ strategies to achieve future career goals with success and satisfaction; and*

*(c) Understand the relationship between personal qualities, education, training, and the world of work; and*

*(3) Social/emotional development intended to help students:*

*(a) Acquire the knowledge, attitudes, and interpersonal skills to help them understand and respect self and others;*

*(b) Make decisions, set goals, and take the necessary action to achieve goals; and*

*(c) Understand safety and survival skills.*

## Public Comment Summary

## COMAR 13A.05.05.02 – School Counseling

Organization	Comment	MSDE Response
Gayle Cicero, Assistant Professor, Loyola University	<p>Strengthen the language by replacing recommended with <b>shall</b> in the area that addresses time spent (recommend 80% of time spent to <b>shall spend 80% of time</b> in direct service to students).</p> <p>Consider individual counseling services rather than individual planning in terms of language. School counselors do provide individual short-term counseling services and I think that needs to be underscored in the document. I like the focus on prevention, but I also think school counselors play a key role in providing direct counseling services. This is even more important with the rising mental health needs among students.</p>	<p>Not accepted for change.</p> <p>Modified the request to reflect the dual nature of school counseling which provides both planning and counseling services. Added counseling after the word planning (Planning/counseling)</p>
Michael Linkins, Retired School Counselor	When I read the proposed updates to COMAR bringing the regulations in line with the ASCA Model, I was thrilled. I wholeheartedly endorse all of the changes.	Accepted
Howard County Public Schools Counselors:  Rachel Schwaab Margaret Jones Karissa Ressler Jillian Hoffman Grace Burnett Alicia Taylor Susan Bradley Allie Downey Alexis Pappadeas Melissa Cheadle	I am reaching out to you in support of the proposed action to revise Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors. The proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.	Accepted

<p>Patti Clifford Steve Burnett Stephanie Thurmon Liz O'Connor</p>		
<p>Howard County Public Schools Counselors:  Phil Cohen  Tina Flynn</p>	<p>I am reaching out to you in support of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.</p> <p>In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.</p> <p>Mental health has become our number one issue facing young people and counselors are at the front line of this battle. Without the ability to spend more time with students and less time doing non-counseling related tasks, our jobs and our students will tremendously suffer.</p>	<p>Accepted</p>
<p>Howard County Public Schools Counselor:  Beth Bengermينو</p>	<p>I am reaching out to you in support of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.</p> <p>The proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.</p> <p>I am an elementary school counselor. It is my job to provide school-based prevention and universal and targeted interventions for students with mental health and behavioral health concerns. My role is to provide supports that are comprehensive in scope, preventative in design and developmental in nature. I should be working with children 80 percent of my day. With additional assigned duties of running 504 meetings and being the PBIS Coach, however, I am spending much of my time doing</p>	<p>Accepted</p>

	<p>clerical work. While I understand the need for a counselor to be a part of PBIS and 504 Plans, I do not think that it is a good use of my time to do this type of paperwork. (Elementary School Counselors do not have secretaries or data clerks.) These menial jobs are taking my time away from students. In addition, because I still have my teaching certificate, I am often pulled to do CoGAT, MISA, and/or PARCC testing for small groups. That takes away too many hours from what my job should be.</p>	
<p>Maureen McNamera, Policy Forms Specialist, Montgomery County Public Schools</p>	<p>This policy aligns with the American School Counseling Association National Model for developing comprehensive school counseling programs.</p> <p>This policy will enable MCPS to increase the use of data and help demonstrate how school counseling programs impact students and the school in measurable terms.</p> <p>The expectation of school counselors developing closing the gap action plans will support our districtwide equity focus and assist school counselors with reaching all students.</p> <p>This policy also will support helping students understand the relationship of academics to the world of work and life through our career readiness initiative.</p>	<p>Accepted</p>
<p>Gretchen Foust, Assistant Professor, Counselor Education, University of Maryland Eastern Shore</p>	<p>I am writing to submit a proposed correction to Title 13A.05.05 Programs of Pupil Services New Regulation .02, for school counselors (and also to voice support for the changes in general):</p> <p>On page 409, section 3. <i>Delivery Components</i>, includes two errors in following the American School Counselor Association National Model for School Counseling Programs:</p> <p>(a) <i>Direct services, recommended to be 80 percent of school counselor services...</i>  (b) <i>Indirect services, recommended to be 20 percent of school counselor services...</i></p> <p>These 80%/20% numbers are applied to incorrect components of the ASCA National Model.</p>	<p>Not accepted for change. This comment suggests that the regulation incorporated the American School Counseling (ASCA) National Model framework by reference in its entirety. The National Model framework was used as a guide for the Maryland regulation but the MSDE choose to enhance the percent of time school counselor spend in direct services to student to 80% and captured all other ASCA components (foundation,</p>

	<p>The 80% figure should be the time spent in a COMBINATION of direct AND indirect services (or in other words, counselors should spend 80 percent of their time in the entire Delivery System). The 20% figure should be the time spent in the other three components: foundation, management and accountability. Nowhere does it indicate the percentage of time that should be spent in direct service vs. indirect service.</p> <p>Thank you for considering these corrections. I fully support the changes to align with the ASCA National Model and applaud the efforts of MSDE to this end.</p>	<p>management, and accountability) in indirect services (3) (b) (iv.)</p>
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**Public Comment - School Counseling Regulation**

Gayle Cicero <gcicero@loyola.edu>

Hello Walt-Hope you are doing well. I reviewed the updates to COMAR regarding school counselors. I really liked most of it and appreciate this needed change! My two recommendations are:

1. Strengthen the language by replacing recommended with **shall** in the area that addresses time spent (recommend 80% of time spent to **shall spend 80% of time** in direct service to students)
2. Consider individual counseling services rather than individual planning in terms of language. School counselors do provide individual short-term counseling services and I think that needs to be underscored in the document. I like the focus on prevention, but I also think school counselors play a key role in providing direct counseling services. This is even more important with the rising mental health needs among students.

Does this make sense? great work---and I appreciate all that you and your team do every day to advocate for strong student services for our young people.

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Michael Linkins

Dear Walter Sallee,

When I read the proposed updates to COMAR bringing the regulations in line with the ASCA Model, I was thrilled. I wholeheartedly endorse all of the changes. Thanks to you and Lynne for persevering through the arduous process of bringing these changes to fruition. I know it was not an easy journey.

Dear Mr. Sallee,

I am reaching out to you in support of the proposed action to revise Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors. The proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Thank you,  
Rachel Schwaab  
Professional School Counselor

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Dear Mr. Sallee,

I am reaching out to you **in support** of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Thank you  
Margaret Jones  
Professional School Counselor

Karissa Ressler

Karissa\_Ressler@hcpss.org

Dear Mr. Sallee,

I am reaching out to you **in support** of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

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HOWARD HIGH SCHOOL 8700 Old Annapolis Rd. Ellicott City, MD 21043 410-313-2867  
(F) 410-313-2870 hohs.hcpss.org May 7, 2019 Walter J. Sallee Director, Student Services and  
Strategic Planning Maryland State Department of Education 200 West Baltimore Street  
Baltimore, MD 21201

Re: 13A.05.05.02 {School Counseling Proposed Regulation}

Dear Mr. Sallee, I am reaching out to you in support of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors. In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Thank you,

Jillian Hoffman Professional School Counselor Howard High School 410-313-2871  
Jillian\_Hoffman@hcpss.org

Dear Mr. Sallee,

I am reaching out to you in support of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Mental health has become our number one issue facing young people and counselors are at the front line of this battle. Without the ability to spend more time with students and less time doing non-counseling related tasks, our jobs and our students will tremendously suffer.

Thank you,

***Phil Cohen***

*School Counselor*

*Atholton High School*

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Dear Mr. Sallee,

I am reaching out to you **in support** of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors. The proposal ensures that we spend our time doing what is important- direct service to kids!!!

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

**Grace Burnett**

School Counselor, 7<sup>th</sup> grade

Ellicott Mills Middle School

410.313.2844

Re: 13A.05.05.02 {School Counseling Proposed Regulation}

Dear Mr. Sallee,

I am reaching out to you **in support** of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Thank you,  
Alicia Taylor, NCC, LCPC  
Professional School Counselor  
Cradlerock Elementary School  
410-313-7610

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Re: 13A.05.05.02 {School Counseling Proposed Regulation}

Dear Mr. Sallee,

I am reaching out to you **in support** of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Thank you  
Susan Bradley, M.Ed.  
Professional School Counselor  
Mayfield Woods Middle School  
7950 Red Barn Way  
Elkridge, Md. 21075

Re: 13A.05.05.02 {School Counseling Proposed Regulation}

Dear Mr. Sallee,

I am reaching out to you **in support** of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Thank you,

Allie Downey

Professional School Guidance Counselor

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Re: 13A.05.05.02 {School Counseling Proposed Regulation}

Dear Mr. Sallee,

I am reaching out to you **in support** of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Thank you,

Alexis Pappadeas

Professional School Counselor

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**Alexis Pappadeas, M.Ed.**

**School Counselor (Grades 10-12, Mu-Se)**

**Howard High School**

**Phone: 410-313-2871**

**Pronouns: She/Her/Hers**

Re: 13A.05.05.02 {School Counseling Proposed Regulation}

Dear Mr. Sallee,

I am reaching out to you in support of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). I firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Thank you,  
Melissa Cheadle  
Professional School Counselor

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***Melissa Cheadle***

**School Counselor: 6th-8th Grades Last Names M-Z**

Elkridge Landing Middle School

410-313-5043

<http://elmsstudentservices.weebly.com>

<https://twitter.com/ELMSCounselors>

Relator \* Maximizer \* Achiever \* Input \* Positivity

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Dear Mr. Sallee,

I am reaching out to you in support of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Thank you

Patti Clifford, LCPC  
School Counselor  
Pointers Run Elementary School

Re: 13A.05.05.02 {School Counseling Proposed Regulation}

Dear Mr. Sallee,

I am reaching out to you **in support** of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Thank you

Dr. Steven W. Burnett

Professional School Counselor

Steve Burnett Ed.D.

School Counselor/Instructional Team Leader

Glenelg High School

Steven\_Burnett@hcpss.org

Re: 13A.05.05.02 {School Counseling Proposed Regulation}

Dear Mr. Sallee,

I am reaching out to you **in support** of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

The proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

I am an elementary school counselor. It is my job to provide school-based prevention and universal and targeted interventions for students with mental health and behavioral health concerns. My role is to provide supports that are comprehensive in scope, preventative in design and developmental in nature. I should be working with children 80 percent of my day. With additional assigned duties of running 504 meetings and being the PBIS Coach, however, I am spending much of my time doing clerical work. While I understand the need for a counselor to be a part of PBIS and 504 Plans, I do not think that it is a good use of my time to do this type of paperwork. (Elementary School Counselors do not have secretaries or data clerks.) These menial jobs are taking my time away from students. In addition, because I still have my teaching certificate, I am often pulled to do CoGAT, MISA, and/or PARCC testing for small groups. That takes away too many hours from what my job should be.

Thank you for your support of School Counselors.

Thank you

Beth Bengermينو

School Counselor

Bushy Park Elementary School

Howard County, Maryland

Beth Bengermينو, School Counselor

Bushy Park Elementary School Counselor

410-313-5500

COMAR 13A.05.05, Programs of Pupil Services  
Regulation .02, School Counseling Program  
Montgomery County Public Schools Comments

**Maryland State Board of Education Statement of Purpose**

The purpose of this action is to define, update, and clarify the requirements for school counseling programs to support and unify the role of school counselors in students' academic, career, and personal/social performance based upon the American School Counseling Association National Model.

**Montgomery County Public Schools (MCPS) Comments**

- This policy aligns with the American School Counseling Association National Model for developing comprehensive school counseling programs.
- This policy will enable MCPS to increase the use of data and help demonstrate how school counseling programs impact students and the school in measurable terms.
- The expectation of school counselors developing closing the gap action plans will support our districtwide equity focus and assist school counselors with reaching all students.
- This policy also will support helping students understand the relationship of academics to the world of work and life through our career readiness initiative.

Maureen McNamara  
Policy and Forms Specialist  
Montgomery County Public Schools  
Office of the General Counsel  
850 Hungerford Drive, Room 156  
Rockville, MD 20850  
240-740-5600

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Re: 13A.05.05.02 {School Counseling Proposed Regulation}

Dear Mr. Sallee,

I am reaching out to you in support of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Thank you,

Stephanie Thurmon M.Ed  
School Counselor  
Reservoir High School

**[Stephanie\\_Thurmon@hcpss.org](mailto:Stephanie_Thurmon@hcpss.org)**

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Dear Mr. Sallee,

I am reaching out to you **in support** of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). I firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Thank you,

Liz P. O'Connor, M.Ed.  
Professional School Counselor  
Glenwood Middle School  
liz\_o'connor@hcpss.org  
410.313.5525

Re: 13A.05.05.02 {School Counseling Proposed Regulation}

Dear Mr. Sallee,

I have been a School Counselor for the past thirty one years. Over the last few years I have seen a huge increase in the need for mental health services for my students. Sadly, it seems I have to spend more time completing paperwork rather than helping these students.

I am reaching out to you in support of the proposed action to regulation Title 13A.05.05.02, Programs of Pupil Services. The new language in Regulation .02 for school counseling supports and aligns with our graduate training and responsibilities we have in providing students with a coordinated data driven school counseling program as professional school counselors.

In closing, the proposed changes set a foundation and alignment with our guiding national organization, The American School Counseling Association (ASCA). We firmly support the proposed revision of 13A.05.05.02 administrative regulations.

Thank you,

Tina Flynn, Counselor  
Mt. Hebron High School  
410-313-2883  
410-313-2502 (fax)

**Tina\_Flynn@hcpss.org**

Good afternoon,

I am writing to submit a proposed correction to Title 13A.05.05 Programs of Pupil Services New Regulation .02, for school counselors (and also to voice support for the changes in general):

On page 409, section 3. *Delivery Components*, includes two errors in following the American School Counselor Association National Model for School Counseling Programs:

- (a) *Direct services, recommended to be 80 percent of school counselor services...*
- (b) *Indirect services, recommended to be 20 percent of school counselor services...*

These 80%/20% numbers are applied to incorrect components of the ASCA National Model. According to the American School Counselor Association's ASCA National Model: A Framework for School Counseling Programs, 3<sup>rd</sup> Edition (p. 43), "*It is recommended that school counselors spend 80 percent or more of their time in direct student services and indirect student services. The remaining 20 percent of time is set aside for program management and school support services, such as school counseling program foundation, management and accountability tasks. In addition, a small portion of the 20 percent of the school counselor's time is spent in fair-share responsibilities...*". (Note: fair share responsibilities refers to duties such as lunch duty, hall duty, etc..)

The American School Counselor Association National Model for School Counseling Programs goes on to clarify:

*"Although spending 80 percent of time in direct and indirect student services is the general recommendation for a comprehensive school counseling program, use of time within the 80 percent may be allocated differently from school to school based on needs identified in the school data."*

*"In programs with more than one school counselor per site, there is often flexibility between and among school counselors in determining how much time individual school counselors spend in the delivery components"*.

So, the 80% figure should be the time spent in a COMBINATION of direct AND indirect services (or in other words, counselors should spend 80 percent of their time in the entire Delivery System). The 20% figure should be the time spent in the other three components: foundation, management and accountability. Nowhere does it indicate the percentage of time that should be spent in direct service vs. indirect service.

Thank you for considering these corrections. I fully support the changes to align with the ASCA National Model and applaud the efforts of MSDE to this end.

Gretchen Foust [gefoust@umes.edu](mailto:gefoust@umes.edu)