



PACA MH/DS
PENNSYLVANIA ASSOCIATION OF COUNTY
ADMINISTRATORS OF MENTAL HEALTH
AND DEVELOPMENTAL SERVICES

House Human Services & Education Committees

**Joint public hearing on mental health services
provided to Pennsylvania's secondary students**

May 24, 2021

The following testimony is submitted on behalf of The Pennsylvania Association of County Administrators of Mental Health and Developmental Services (PACA MH/DS). PACA MH/DS is a statewide association representing all county behavioral health and developmental disability programs, behavioral health managed care oversight agencies and county operated managed care programs throughout the Commonwealth.

Physicians and educators have long recognized that mental illness is a disease that can impact students in a variety of ways, including suicidal thoughts, depression and anxiety.

We also know and understand much more clearly that adverse experiences at home such as abuse or neglect can have a tremendous impact on students in the classroom. If a parent is absent or incarcerated, for instance, their children might need additional mental health support.

Growing numbers of students have family members impacted by the current COVID-19 pandemic as well as the opioid crisis and many are facing housing or food insecurities. There are any number of factors that can impact students and their ability to learn and thrive.

Against this backdrop, it is critically important that parents and students are aware that help is available for their children and family in many schools throughout our Commonwealth. Under the innovative statewide Medicaid Behavioral HealthChoices (BHC) program, county and school leaders are helping families address a myriad of challenges.

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One example from the central region of the state, through the Capital Area Behavioral Health Collaborative, there are currently 239 satellite mental health outpatient clinics in schools throughout Cumberland, Dauphin, Lancaster, Lebanon and Perry counties. In 2019, 4,620 students enrolled in the Medicaid BHC program received counseling by a licensed clinician in one of these satellite mental health programs. The age of students who received this treatment is telling:

Ages 0-5: 155

Ages 6-12: 2,731

Ages 13-17: 1,734

During 2019 in just the five counties mentioned above, over \$24 million was dedicated to a variety of school-based mental health services. This effort would not be possible without the BHC program, which was created more than 20 years ago and has continued to evolve over the years to address consumers' needs.

Under BHC, each county has the opportunity to manage the Medicaid BHC program as the primary contractor or to work with other counties and form collaborative partnerships. Counties have the ability to identify what innovative approaches can best meet the unique needs of their communities, including the local educational systems.

The BHC contract allows counties to "reinvest" a portion of the capped savings that they may realize through sound management and efficiencies. Reinvestment funds can be used to start up in-plan services, fund social determinants of health and to create additional innovative, cost-effective supplemental programs to further meet local needs. These programs and services are developed in partnership with consumers, providers, Behavioral Health MCOs (BHMCOs), and the Department of Human Services' (DHS) Office of Mental Health and Substance Abuse Services (OMHSAS), which approves and monitors all of these initiatives. Some counties have used these funds to start their school-based mental health programs.

Making these resources available in schools makes perfect sense for several compelling reasons, starting with the obvious fact that typically we know where these young people are every Monday – Friday. This is a captive audience. The pandemic has impacted this to a degree but the school-based approach still applies even virtually. The more schools begin to provide in-class learning as a result of the loosening of COVID restrictions, this will allow for even greater opportunities to work with more students.

In addition, we know from our experience that parents seeking help for their children and families are sometimes more comfortable going into a school building than an outpatient clinic. Our society has come a long way in accepting that mental health challenges are pervasive, yet we need to recognize that some families, and young people especially, can be fearful of the stigma that unfortunately still can be associated with mental health challenges and receiving help. By offering these services in the school, this barrier can be removed. These programs also offer resources to teachers and other school personnel as well, which improves the overall environment for everyone.

We also know families live close to their schools, so these services are more accessible and are able to address issues more quickly. Consider a family, for instance, being able to drive to their local school for counseling, rather than having to make the drive to an unfamiliar setting in another city or town.

Parents should be encouraged to ask their school leaders and find out if these services are available in their children's school building or in their district.

PACA MH/DS appreciates the invitation to provide comments on this very important issue. The association looks forward to working with the House Human Services and Education Committees as you continue to explore ways in which to improve the lives of our younger population.



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House Education Committee

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Testimony of the Pennsylvania School Counselors Association

On behalf of the Pennsylvania School Counselors Association (PSCA), thank you for the opportunity to testify before you today.

Over the last year and a half, our students here in Pennsylvania have faced perhaps the greatest disruption ever to impact our school systems and communities. COVID-19 not only closed our school buildings last spring, but continued to loom as an ever-present force in students' lives. It impacted how they received instruction, how and when they were able to see their friends, the employment of their families and neighbors, and the safety and stability of what school is supposed to be as they grow and develop.

While many of our students have demonstrated resilience and perseverance through these unprecedented challenges, many others are struggling to cope with the increased strain on their mental, social, and emotional health. Throughout the pandemic, mental health problems have accounted for a growing proportion of children's visits to hospital emergency rooms throughout the pandemic.¹ Mental and behavioral health concerns have been and continue to be the top referral categories through Pennsylvania's anonymous student reporting app Safe2Say Something.² The rates of teenage suicide have been on the rise for the past decade,³ and in the last administration of the Pennsylvania Youth Survey (PAYS), depressive symptoms were reported by students as one of the main risk factors they face, along with low attachment to their communities, and a low commitment to their schools – all factors that have steadily increased across all grade levels since 2015.⁴

1 in 4
students
reported that they think
“sometimes, life is not worth it.”
(PAYS, 2019)

¹ CDC (2020). Mental Health–Related Emergency Department Visits Among Children Aged <18 Years During the COVID-19 Pandemic — United States, January 1–October 17, 2020

² Department of the Attorney General (2019, 2020). Safe2Say Something Annual Reports

³ CDC (2020). State Suicide Rates Among Adolescents and Young Adults Aged 10–24: United States, 2000–2018

⁴ PA Commission on Crime and Delinquency (2019). 2019 PA Youth Survey (PAYS) Statewide Report Highlights

Now more than ever, Pennsylvania students and their families need consistent and coherent school support systems in place to prevent further disruption that, left unaddressed, could stunt their growth and development and the achievement of their maximum potential.

Broadly speaking, we believe that Pennsylvania schools have a solid foundational infrastructure for comprehensive school counseling programs that will support the mental/social/emotional health, the academic development, and career planning needs of our students.

With over 4,800 school counselors already working in our school systems across the Commonwealth,⁵ we have the potential to deliver the kinds of screening, intervention, and prevention our students are going to need as we help them navigate all the disruption they've experienced over the past year and a half.

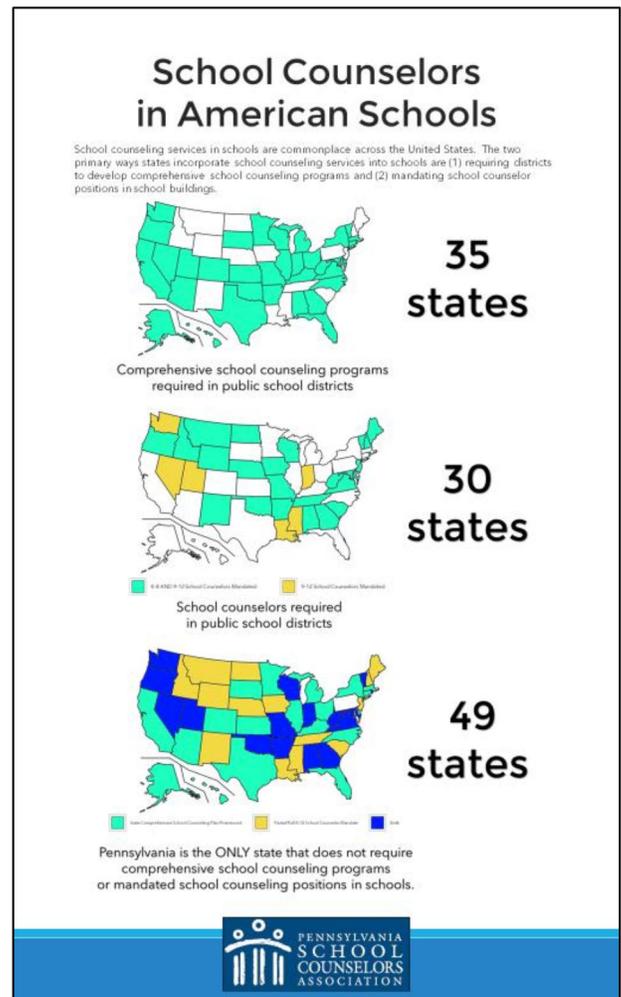
Across the United States, school counseling services are generally guaranteed to students through one of two state practices – requiring school districts to outline comprehensive school counseling programs, or requiring a certain number of student to school counselor ratio in school buildings. Some states do both of these things.

Pennsylvania is the only state in America that does neither of these things.

That might surprise you, but beyond surprise, we hope it provokes within you a desire to do something to something about it.

Standing out as the only state yet to take action on school counseling services for our students, we can think of no better or more timely reform than guaranteeing all Pennsylvania students have access to comprehensive school counseling programs.

School counselors in Pennsylvania are often confronted with the reality that their role is not well understood by school leaders and the general population. We must not only provide services to students, but we must simultaneously educate and advocate our schools and communities about our roles and areas of expertise. Because the needs of our students are so great, and because in many schools the number of students assigned to school counselor's caseload is so high, the capacity to educate and advocate may be limited, and this is most likely to happen in the schools and communities that need school counseling services the most.⁶



⁵ PSCA (2021). PA School Counselor Staffing Report.

⁶ PSCA (2021). PA School Counselor Staffing Report.

The professional identity and training requirements for school counselors have evolved dramatically since the 1990s. Prior to this, “guidance counselors” took on a limited role in the lives of students, performing guidance in post-graduation planning and vocational opportunities. Guidance counselors generally worked in isolation and did not have to plan a guidance curriculum that accommodated students with specific needs. Additionally, this position handled student guidance on a case-by-case basis rather than ensuring that all students had equal access to them as an integrated part of their education.⁷

In contrast, “school counselors” take an active role in the student educational experience, designing and implementing comprehensive school counseling programs designed to improve student success for all students. These programs are focused on healthy and holistic academic, career, and personal/social development, maximizing access, equity, and opportunity for all students.⁸

School counselors are a critical part of Pennsylvania’s vision to help all students translate their interests and aspirations into tangible college and career plans and choices. However, many school counselors are stretched thin, juggling several responsibilities and significant caseloads, and are often isolated in their work.⁹ During the listening sessions conducted by the PA School Safety Task Force in 2018, the need for additional school counselors, and supports for student mental health and social emotional learning, was noted in listening sessions all across the state.¹⁰

As it stands right now, school districts are required to “prepare a written plan for the implementation of a comprehensive and integrated K-12 program of the student services based on the needs of its students.”¹¹ Student services as defined in the PA Code “**may** include guidance counseling,”¹² but the definition stops short of guaranteeing these services to students.

This definition is written this way on purpose – the State Board of Education stated in 2005 that previous regulation regarding pupil personnel services was “too detailed and prescriptive for today’s educational environment” and “limit(ed) the flexibility of school entities in the design of a comprehensive system of student support services.”¹³ The Board stated:

*By consolidating the regulations into the student services section (Chapter 12), previously addressed in Chapter 7, schools would be provided additional flexibility to deliver a comprehensive program of student services to their students. Depending upon implementation on the local level, **this might lead to improving the scope and quality of services provided to students while also providing cost savings.***¹⁴

In light of the fact that Pennsylvania is the only state in America whose students are not guaranteed school counselors or school counseling programs, we wish to examine together “the scope of services provided to students” in the years following this change in policy.

⁷ ASCA (n.d.). Guidance Counselor vs. School Counselor.

⁸ ASCA (2020). The Role of the School Counselor.

⁹ Every Student Succeeds Act, Pennsylvania Consolidated State Plan (page 96)

¹⁰ PA School Safety Task Force Report (2018)

¹¹ 22 Pa Code Chapter 12.41

¹² 22 PA Code Chapter 12.16

¹³ 35 Pa.B. 6510

¹⁴ 35 Pa.B. 6510

Regarding student **academic development**, Pennsylvania students have been subject to numerous and substantial changes to their courses of study in this time. We adopted new academic standards – Career Education and Work Standards¹⁵ in 2006, Common Core standards¹⁶ in 2010, and the subsequent state-specific PA Common Core Standards¹⁷ in 2014.

Pennsylvania eliminated the high school PSSA exams, and replaced them with end-of-course Keystone Exams – exams have a storied past, beginning with measuring student readiness for graduation and work, and evolving into a statewide requirement for graduation.¹⁸

Most recently, Act 158 of 2018 requires school districts to monitor student completion of one of five High School Statewide Graduation Pathways, with several of these pathways involving the collection a portfolio of evidence demonstrating readiness for graduation.¹⁹ As with the previous Keystone requirements for graduation,²⁰ the implementation of this new framework has been postponed.²¹

School counselors actively monitor student achievement and progress toward graduation requirements. We often manage these processes, especially as relates to academic planning and course selection, and we must remain knowledgeable about any changes in policy so we can provide meaningful and accurate advisement to students and families.

At the same time, school counselors are often responsible for test administration activities in our schools, which commonly disrupts our availability to students during testing seasons. There was a time when in my own district, our high school counseling office had to post a sign on our office door notifying students we were unavailable except in the case of an emergency, as we were proctoring and administering state tests and College Board exams, the entire month of May.

Regarding student **career development**, Pennsylvania indicated in its state plan for the Every Student Succeeds Act (ESSA) that K-12 Career Readiness would be one of its federal School Quality and Student Success indicators, which included Career Ready Benchmarks as part of the Future Ready PA Index, each school district’s public facing school progress report.²²

This aligned with regulation requiring school districts to have a written plan for vocational guidance on file “for the development and implementation of a comprehensive, sequential program of guidance services for kindergarten through 12th grade,” referred to as a K-12 Guidance Plan, or more colloquially as a “Chapter 339 Plan.”²³

For many years, school counselors across the state have participated in trainings developed through the Department of Education, led by a former school counselor and career development champion Mike Thompson. Mike and his team developed a toolkit²⁴ and training model that has been implemented in

¹⁵ 36 Pa.B. 3528

¹⁶ 40 Pa.B. 5903

¹⁷ 44 Pa.B. 1131

¹⁸ 40 Pa.B. 240

¹⁹ Act 158 of 2018 (P.L. 1146)

²⁰ Act 1 of 2016, Act 55 of 2017, Act 39 of 2018

²¹ Act 136 of 2020

²² Every Student Succeeds Act, Pennsylvania Consolidated State Plan

²³ 22 Pa Code Chapter 339.31

²⁴ PDE (2011). Tools for Developing a Comprehensive K-12 Guidance & Counseling Plan

almost every school district across the state. While Mike tragically passed away last year, Pennsylvania is indebted to his relentless advocacy for students and their career development. He often said that “career development is not one more thing on the plate for schools to do – it IS the plate.” He also reminded us all that “career development is one of the best mental health interventions a school can provide to children.”

School counselors have been key leaders for schools in the development and implementation of student career portfolios, containing the collection of required student career artifacts aligned with both the Career Education and Work Standards and the PA Career Ready Skills^{25 26}. This process links directly to the Career Readiness Indicators on the Future Ready PA Index, and school counselors now manage these processes for many of our schools across Pennsylvania.

Regarding **social, emotional, and mental health and development**, Pennsylvania has taken legislative action to recognize these needs in our schools. We required the adoption of suicide awareness and prevention policies.²⁷ Significant updates were made to Pennsylvania’s child abuse reporting laws in 2015.²⁸ Laws regarding student attendance, an additional federal indicator of School Quality and Student Success, were updated to require earlier intervention in student truancy, Student Attendance Improvement Plans (SAIPs), and to change the compulsory age of school attendance.²⁹

School safety and security priorities and the subsequent trauma-informed approaches became required components of school programming, including the rollout of the Safe2Say Something anonymous reporting app in 2019.³⁰ As referenced earlier, since this program began, the top concerns reported each year have been mental and behavioral health concerns.³¹

While school counselors have provided responsive services for students in crisis for many years, the need for proactive, preventative, and educational programming specific to mental health and social-emotional learning has been magnified by the disruptions brought to our schools by COVID-19.

The scope of services that school districts provide has become more complex in the last 16 years, and while school counselors have adapted as flexibly as they can, their capacity to work effectively in these areas with students is limited by two key barriers – minimal definition of the scope of services they are providing to students, and the need for reasonable student caseloads. While this may enable school districts to use school counselors more flexibly, it also creates a lack of clarity for students and families as to the services they can expect to receive from their school counselors.

Even in schools where school counselors are able to educate and advocate for appropriate roles and responsibilities – which is done for the efficiency and quality of service for the benefit of all students – they may be assigned to multiple buildings, or have a caseload that makes delivering services to all students unrealistic.

²⁵PDE (2019). Career Readiness...ESSA Accountability: Guidelines for Evidence Collection, Monitoring, and Reporting

²⁶ and PDE (2018). The Pennsylvania Career Ready Skills: An Introduction

²⁷ Act 71 of 2014 (P.L. 779)

²⁸ <https://archive.triblive.com/news/pennsylvania-enacts-modernized-child-abuse-laws-after-sandusky-scandal/>

²⁹ Act 138 of 2016, Act 139 of 2019

³⁰ Act 44 of 2018, Act 18 of 2019

³¹Department of the Attorney General (2019, 2020). Safe2Say Something Annual Reports

When you think about the kinds of mindsets school counselors work to cultivate in students through their programs, one that comes to mind is the idea that “just because you can, doesn’t mean you should.” For school counselors in Pennsylvania, the tragic dilemma confronting us and the work we do for kids is “just because you should, doesn’t mean you *can*.”

Now, more than ever, our students need the kinds of screening, intervention, prevention, individual planning, and support that comprehensive school counseling programs, delivered by certified school counselors, can provide. Pennsylvania is primed to join the rest of the nation with a solid infrastructure of school counselors in almost every school across the Commonwealth already.

As Pennsylvania seeks to address the disruptions of COVID-19, our students and our workforce need our school systems to be more than flexible – they need predictability and stability too.

PSCA asks the state to guarantee that every child, no matter their zip code or grade level, receives access to school counseling services.

Thank you for the opportunity to participate in this discussion today. We look forward to working with the committee to address this and other important education reform needs in our schools across the Commonwealth.