February 2, 2015

The Honorable Lamar Alexander
Chair, Senate Health Education, Labor and Pensions Committee
455 Dirksen Senate Office Building
Washington, DC  20510

Dear Chairman Alexander:

On behalf of The American Counseling Association (ACA), we thank you for the opportunity to provide feedback on the draft of the Every Child Ready for College and Career Act of 2015 (ECRCCA), amending the Elementary and Secondary Education Act (ESEA). As the world's largest association representing professional counselors in various practice settings, the American Counseling Association is committed to removing barriers to learning and furthering the education of all students.

Counseling is a professional relationship that empowers diverse individuals, families, and groups to accomplish mental health, wellness, and education and career goals. Using counseling theories and techniques, school counselors accomplish these goals by fostering educational and social equity, access, and success. The professional school counselor serves as a leader, an assertive advocate for students, a consultant to families and educators, and a team member to teachers, administrators and other school personnel to help each student succeed. Professional school counselors provide developmental, intervention, and remedial assistance through large and small group guidance and individual counseling activities, and crisis intervention to help all students.

The following are the specific recommendations that the American Counseling association would like to see addressed in the upcoming ESEA reauthorization. We ask that you please consider our changes when drafting the next version of bill:

Recommendation 1: Unbundle Grant Programs.

As proposed in the 2015 ESEA Reauthorization; School Improvement Grants, 21st Century Community Learning Centers, School Counseling, Physical Education, and several other grant programs would be consolidated into larger school climate funding streams, awarded on a formula basis to States and LEAs which could be used for a number of purposes covered under the current programs. While the school climate grants are critical to improving a student’s learning environment. We are concerned that the block grant approach will require school
districts to make difficult choices among a sea of critical services, thus resulting in fewer students receiving the support they need to succeed. Although the program is small, ESSCP plays a critical and fundamental role in expanding students' access to necessary counseling services and should stand alone.

**Recommendation 2: Fully Integrate School Counselors into the Elementary and Secondary Education Act.**

ACA would ask that you enable school counselors to receive professional development and be involved in school improvement plans under Title II of ESEA. Currently, ESEA does not fully integrate school counselors into professional development and school improvement programs. In a number of instances throughout ESEA, professional development for school counselors and other specialized instructional support personnel (SISP) is included only "as appropriate," whereas participation by teachers and administrators is allowed without qualification. Research shows the positive impact school counselors and other SISP have on the academic, social, and emotional achievement, and college and career readiness of students. Their participation in school improvement efforts should therefore be strongly encouraged, if not required.

**Recommendation 3: Give School Counselors and Specialized Instructional Support Personnel Adequate Representation in the Department of Education.**

ACA would recommend that the Congress establish an Office of Specialized Instructional Support Personnel within the Department of Education, as was called for in the "Reducing Barriers to Learning Act of 2013" (H.R. 1940, 112th Congress).

The "Reducing Barriers to Learning Act of 2013" would improve our investment in specialized instructional support personnel (SISP), including school counselors, school psychologists, and school social workers, to adequately address all barriers to student academic success. ACA strongly supports establishing an Office of Specialized Instructional Support Personnel within the Department of Education, as directed in this bill. This new office would provide much needed professional development opportunities, evidence-based research in these unique fields, provide technical assistance, and coordination with state and local agencies. An Office of Specialized Instructional Support Personnel would also ensure that U.S. Department of Education initiatives involve the professional knowledge and skills of school counselors and other specialized instructional support personnel.

**Recommendation 4: In any newly proposed grant program, mental health services should have a baseline allocation,**

ACA strongly urges the creation of a program that would provide formula grants to States for implementing comprehensive programs to foster positive learning conditions in public schools, including mental health services, physical health services, and school safety strategies. Preventative and responsive mental health programs are critical to our students’ success.
Unfortunately, these services are usually the first to be cut. Due to the still prevalent stigma surrounding mental health services and the severe underfunding of our nation's mental health system, mental health programs should have a funding baseline allocation.

**Recommendation 5: Increase Access to School Counselors for All Students.**

ACA would ask that Congress amend the Elementary and Secondary School Counseling Program (ESSCP) to increase the funding levels. Recent school tragedies have increased focus on the need for mental health supports in schools. ACA urges reauthorization for the Elementary and Secondary School Counseling Program as contained in ESEA, Title IV, Part D Subpart 2, Section 5421(c)(2). This program helps to increase student academic achievement and improve school safety by increasing school counseling programs and school-based mental health professionals in the schools that demonstrate the most need. There is an overwhelming interest and demand for this competitive grant, which improves student-to school counselor ratios and reduces schools' rates of disciplinary actions. It is imperative that the program’s goals be prioritized for schools.

ACA urges you and the Congress to develop legislation that continues to provide meaningful access to school-based counseling services for students by hiring qualified state licensed or certified school counselors. We would be pleased to serve as a resource to the Committee as you work through this process. Thank you again for the opportunity to submit recommendations and we look forward to working with your office in the future.

Richard Yep, CAE, FASAE  
Chief Executive Officer  
The American Counseling Association