

My comments relate to the proposed certification requirements for school counselors. I am gravely concerned about Sec. 10-145d-922. Provisions of services to students with disabilities. This section is in sharp contrast with the State of Connecticut document entitled *A Guide to Comprehensive School Counseling Program Development*. The guide clearly defines the role and program of school counselors in assisting ALL students in acquiring critical skills in the academic, career and personal/social aspects of development. Nowhere in this document is there any articulation that a school counselor provide case management or coordination services to special education but rather collaborate with special educators and other school personnel. This is not an omission but rather a purposeful description of the school counselor's role.

The proposed regulations open the door to change the role and program of school counselors from working with all students on skill development and prevention to working with a small percentage of the population via coordination of special education services.

Recent research conducted by the Center for School Counseling Outcome Research at UMASS Amherst in collaboration with the CT Department of Education and the CT School Counselor Association suggest a meaningful connection between lower suspension rates, higher attendance rates, fewer discipline problems, and higher high school graduation rates in schools where school counselors were performing the role and function outlined in the above mentioned CT Guide.

Of the recommendations for policy makers and school leaders is "to eliminate the tasks for school counselors that are not related to their primary role and function and those activities that stop counselors from spending 80% of their time working directly with students. These essential work tasks for counselors are already articulated in the comprehensive program model published by the Connecticut Department of Education (2008)." The research further advises that the current gap in school counseling programs across Connecticut high schools advantages some students and unfortunately disadvantages far too many others. The way the proposed regulations are written would undermine the role and function of the school counselor as outlined by both the CT Department of Education and the National Model set forth by the American School Counselor Association. Lastly, the proposed regulations blur the role and program of school counselors with special services providers.

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