

I am writing to voice my concerns about the proposed certification requirement for school counselors. Specifically, section 10-145d-922 lumps school counselors in with school psychologists, school social workers, school marriage and family therapists, and speech and language pathologists. Professional school counselors implement whole school programming. To completely understand the role of the school counselor, I direct you to the American School Counselor Association's National Model website (<http://ascanationalmodel.org/>), and our own Connecticut School Counselor Association Website for Comprehensive School Counseling Programs (<http://www.ctschoolcounselor.org/sites/ctschoolcounselor.org/files/comprehensive-school-counseling-guide-final-6-02-08.pdf>).

School counselors develop whole school systemic programs, classroom guidance, group counseling, and individual interventions to meet the needs of ALL students in the school, which is very much UNLIKE the other professionals in the building with whom they have been lumped. Other professionals, such as the school psychologists, school social workers, school marriage and family therapists, and speech and language pathologists work with only a small subset of the student population- not the ENTIRE student population as do school counselors. Reading a.-f. in this section makes it appear as though their primary responsibility is toward special education students. Although, school counselors develop programming for this population of students, their charge is much greater than what a-f. seem to suggest. I would respectfully and strongly suggest that the committee overseeing these regulations reconsider lumping school counselors in with these other professionals, and taking the time to truly understand the role of the school counselor.

In Sec. 10-14d-926c, there is listed a requirement for school counselors to receive "A minimum of 20 hours of training in design, implementation of behavioral support and analysis for students with behavioral disabilities or autism spectrum disorders." I am not opposed to school counselors learning more about behavioral disabilities or ASDs. In fact, as a former school counselor, a school

counselor educator, and mother of twins with ASD, I applaud your intent to make sure that all professionals in the building understand more about ASDs. However, I believe that this section could be made more relevant to school counselors. It is not the school counselor's job to "design, assess, and implement behavioral support and analysis." That is certainly more relevant to the other professionals listed earlier. Rather, the school counselor should be involved in helping these students, through systemic programs, classroom guidance, group counseling, and individual interventions to provide personal social, academic, career, and college readiness support. These types of school counselor interventions would include programming in: social skills, making friends, expressing feelings, teaching typical students to accept those with differences, providing peer tutors and peer mentors, assessing interests and abilities for post-secondary employment, and finding college programs and internships that will provide supports specifically designed for students with ASDs. Frankly, I could easily list well over 100 interventions that school counselors could undertake on behalf of students with behavioral disabilities and ASDs, but none of these are reflected in this section of the regulations. Please reconsider and revise the school counselor certification requirements to be in line with the national and state role definition of school counselors. Remove Sec. 10-145d-922 and revise Sec. 10-14d-926c, accordingly.

Respectfully submitted,

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