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Additional Questions Regarding New School Counselor Preparation Programs Designed to Meet Commissioner's Regulations Part 52.21(d)

1. Since every program is basically a new program with a new code, do existing programs need external review in order to resubmit for registration under the new regulations.

Answer: NYSED's interpretation of the question:

Do new program proposals in school counseling designed to lead to initial and/or professional certification, and meet Part 52.21(d), need an external review?

The answer to this question depends upon the institution submitting the proposal for a new program in school counseling.

For institutions that currently have school counseling programs registered to lead to provisional and/or permanent, **no external review is required** for the new program proposal.

For institutions that DO NOT currently have school counseling programs registered to lead to provisional and/or permanent, **an external review is required** for the new program proposal.

2. Is there a need for a master plan for existing programs?

Answer: NYSED's interpretation of the question:

Is there a need for a master plan amendment (MPA) for new program proposals in school counseling designed to lead to initial and/or professional certification, and meet Part 52.21(d)?

Again, the answer to this question depends upon the institution submitting the proposal for a new program in school counseling.

For institutions that currently have school counseling programs registered to lead to provisional and/or permanent, no MPA is required for the new program proposal.

For institutions that DO NOT currently have school counseling programs a MPA may be needed if the program is:

- An institution's initial authorization to award a degree (i.e., a new college);
- An institution's first program at a new level of study (e.g., first master's degree);
- An institution's establishment of a branch campus or inter-institutional program;
- At each degree level an institution's first program (associate, baccalaureate, first-professional, master's, and doctoral) in a new disciplinary area.

Questions 3, 4 and 5 reference bilingual education extension programs and mental health bridge programs. The following information is provided to answer questions 3, 4 and 5.

3. Bilingual School Counseling, does it need to be re-registered?
4. How do programs (with 60 credits) that have the bilingual extension as part of the master's degree register in order to keep the bilingual extension as part of the degree--basically, do we need one or two applications? How should the standards/sub areas be presented on the syllabus?
5. We are planning four school counseling pathways: School Counseling, Bilingual School Counseling (which both exist currently), School Counseling with Mental Health Bridge, and Bilingual School Counseling with Mental Health Bridge. Do we need to do four applications, or will one application suffice?

Bilingual Education Extensions to School Counselor Certification:

Initial and Professional Bilingual Education Extensions

At the May 2021 Board of Regents meeting, the Regents reviewed proposed regulatory amendments to establish the Bilingual Education extension for school counselors holding Initial and Professional School Counselor certification. The proposal also outlines the registration requirements for programs that would lead to the Bilingual Education extension for Initial and Professional School Counselor certificates. The Initial and Professional School Counselor certificates will be first issued

on February 2, 2023. See <https://www.regents.nysed.gov/common/regents/files/521hed2.pdf>

The proposal is currently in the public comment period and is expected to be presented to the Board of Regents for adoption at its meeting in September 2021. The Department will not be able to register programs that would lead to the Bilingual Education extension for Initial and Professional School Counselor certificates until the new registration requirements are in effect.

Provisional and Permanent Bilingual Education Extensions

Provisional and Permanent Bilingual Education extensions for school counselors holding Provisional and Permanent School Counselor certification will continue to be available on or after February 2, 2023.

- Programs preparing school counselors for Provisional and Permanent Bilingual Education extensions **only** may continue on or after February 2, 2023.
- Programs preparing school counselors for both Provisional School Counselor certification and the Provisional Bilingual Education extension may continue, and institutions will be able to recommend candidates in these programs for Provisional School Counselor certification **through February 1, 2023**.
- Programs preparing school counselors for both Provisional and Permanent School Counselor certification and the Provisional and Permanent Bilingual Education extensions for those certificates can remain registered only as Permanent School Counselor certification program that also lead to Provisional and Permanent Bilingual Education extensions on or after February 2, 2023. Candidates who are enrolled in a program that leads to Provisional and Permanent School Counselor certification **must complete ALL requirements for their Provisional School Counselor certificate by February 1, 2023, including 30 credits in school counseling and the required internship, so that the institution can recommend them for Provisional school counseling certification by February 1, 2023**.

Beginning with the fall 2021 semester, all school counseling programs admitting new candidates for School Counselor certification must lead to Initial or Initial/Professional certification.

Bridge Program for Mental Health Licensure

Programs requiring a master's in counseling or other related field leading, designed to lead to (bridge) to Mental Health Licensure should be submitted to the Office of Professions, see <http://www.nysed.gov/college-universityevaluation/professional-licensure-programs>

Bridge Program for School Counseling Certification

A program can be designed to provide a pathway from Mental Health Licensure to School Counselor certification. The bridge program must be designed to meet all regulations for initial School Counselor certification as defined in Part 52.21(d). It must require a master's degree of a minimum of 48 semester hours of graduate study in counselling for admission. It must include a college - supervised practicum and internship in School Counseling. It must include a minimum of 15 semester hours of graduate study in school counseling, and the combination of prior study and program coursework must address the eight core content areas required for School Counselor certification.

6. If we modify an existing course, is it considered a new course. What percentage of an existing course can change without being considered new?

Answer: For the purposes of registering programs leading to initial and initial/professional certification in school counseling, institutions are required to show how courses in the proposed program meet all eight core content areas.

“The Department does not expect a one-to-one correspondence between each individual course and a core content area. It is more likely that the required core areas and subarea content will be addressed across multiple courses. Syllabi submitted should evidence the core content area and subareas the course is addressing.” (See Program Application)

If an existing course is modified, even slightly, to meet any part of the new eight core content areas or a new course is being developed to meet any of the eight core content areas, then syllabi must be submitted. Please see the application at: http://www.nysed.gov/common/nysed/files/final-school-counselorapplication_0.docx.

Please note that the submission of complete application(s), to include syllabi, will facilitate a timely review by the Department. Incomplete or insufficient application and materials could result in a delay of the review.

Questions 7, 8 and 9 reference faculty and staffing requirements for new programs. The following information is provided to answer questions 7,8 and 9.

7. Does the faculty have to be full-time School Counseling faculty, or can they be Mental Health counseling too, since school counseling students are in courses that are taught by Mental health counseling faculty such as assessment in counseling or human development?

8. Does the faculty have to be Full-time in the School Counseling/Counseling Department to be counted as meeting the (viii) Faculty.(a) Institutions shall provide sufficient numbers of qualified, full-time faculty in order to foster and maintain continuity and stability in school counselor programs and policies and ensure the proper discharge of all instructional and other faculty responsibilities.
9. For this standard in the regulation(b) Staffing requirements. (1) Except as provided in subclause (2) of this clause, institutions shall meet the following staffing requirements: Institutions shall ensure that the majority of credit-bearing courses in the program are offered by full-time teaching faculty. Does this mean I can count my Mental Health Counseling faculty in the staffing numbers or other faculty who teach full-time in another department, but teach one course in the Counseling Department?

Answer: The majority of credit bearing courses in the program must be offered by full-time faculty at the institution. Faculty do not have to be full time within a specific department (ie. School Counseling). **The scope of the review of staff will be to ensure that full-time faculty:**

a. *“... have demonstrated by training, earned degrees, scholarship, experience, and by classroom performance or other evidence of teaching potential, their competence to offer the courses and discharge the other academic responsibilities which are assigned to them.”* [§52.2(b)(1)]

b. *“...who teach within a curriculum leading to a graduate degree shall possess earned doctorates or other terminal degrees in the field in which they are teaching or shall have demonstrated, in other widely recognized ways, their special competence in the field in which they direct graduate students.”* [§52.2(b)(5)]

And that institutions..... *“..... ensure that the majority of credit-bearing courses in the program are offered by full-time teaching faculty. Faculty assignments shall not exceed 9 semester hours per semester for graduate courses, or 21 semester hours per academic year for faculty who teach a combination of graduate and undergraduate courses, while still providing sufficient course offerings to allow candidates to complete their programs in the minimum time required for earning the degree. Individual faculty members shall not supervise more than 18 candidates per semester. Supervision of practica and internships shall be considered by the institution in determining faculty load, and institutions shall demonstrate how such supervision is considered in determining faculty load.”* [§52.21(d)]

10. In table G it states: Practicum Experiences:**evaluating key school counseling program elements.** Does this mean the classroom, or the field experience is where this must take place?

Answer: The 100 hours of practicum experiences must be within a school counseling program setting in grades K-12 (the field) with “a minimum of 40 clock

hours of direct student contact in group counseling, individual counseling, and school counseling core curriculum lesson delivery and a minimum of 60 clock hours on developing, implementing and evaluating key school counseling program elements.”

11. Regarding table H, do we need to have a K-8 and a 9-12 internship class, so that it is indicated on the student’s transcript?

Answer: We realize the guidance document may have led institutions to believe that each of the 300 hours experiences were to be individual internships. This is not the case.

The regulations require a 600-hour internship; a 300-hour experience in grades K-8 and a 300-hour experience in grades 9-12. How the internship is represented on the student’s transcript is an institutional decision.

Please note: The guidance document has been revised for clarity.

12. Do the amounts of K-8 and 9-12 practicum and internship experience need to be even or is there latitude for students to have more in the areas that they seek to pursue employment in?

Answer: Commissioner’s regulations provide flexibility for grade level distribution during the practicum. However, regulations are purposefully very specific about the distribution of clock hours in the grade levels within the internship. See also questions 22 and 23, on page 10, of the Q and A.

School Counseling Practicum:

Candidates must have a minimum of 100 clock hours in a K-12 school counseling program setting. Institutions have flexibility in how they structure the practicum in terms of content and grade level.

School Counseling Internship:

Candidates must have a minimum of 600 clock hours in a supervised school counseling internship in a K-12 school counseling program setting, a minimum of 300 clock hours of the internship must be in the elementary and middle school grades (K-8) and a minimum of 300 clock hours of the internship must in the secondary grades (9-12);

13. How strict is the state in assessing each subarea of each of the key school counseling areas? Do we need to ensure every element of each is on a syllabus of a current course?

Answer: Per Commissioner’s Regulations §52.21(d)(2)(i), programs must ensure that candidates’ complete study in the following eight core content areas and their subareas of school counseling:

- 1) Foundations in professional school counseling including the subareas of understanding the history and purpose/philosophy of, and the

laws, policies, and regulations governing school counseling. School counselors engage in continuous professional growth and development, advocate for appropriate school counselor identity and roles, and adhere to ethical practices;

2) Career development and college readiness including the subareas of use of a variety of research-based school counseling approaches to provide services to meet the career needs of all students;

3) Supportive school climate and collaborative work with school, family and community including the subareas of collaborating with colleagues, families, and community members to cultivate an inclusive, nurturing, and physically safe learning environment for students, staff, and families; 4) Equity, advocacy and diversity in programming and in support of students including the subareas of understanding cultural contexts in a multicultural society, demonstrating fairness, equity and sensitivity to every student, and advocating for equitable access to instructional programs and activities;

5) Child growth, development and student learning including the subareas of using knowledge of child development, individual differences, learning barriers, and pedagogy to contribute to and support student learning; 6)

Group and individual counseling theories and techniques including the subareas of using a variety of research-based counseling approaches to provide prevention, intervention, and responsive services to meet the academic, personal, social and career needs of all students.

7) Best practices for the profession and in school counseling programming including the subareas of assessing, developing, implementing, leading, and evaluating a data-driven comprehensive school counseling program that utilizes best practices and advances the school's mission; 8)

Research and program development including the subareas of using research and evaluation to advance school counseling programs, their components and the profession.

Institutions have flexibility in how they meet these core areas. For example, they may offer a single course dedicated to group counseling theories, or they may combine group counseling theories with another course. The Department is looking to see that the core content areas and sub areas are met, not for a checklist of specific courses.

While institutions have flexibility in how they meet these core areas, institutions are required to meet all of the eight core content areas and their subareas to the fullest extent. Coverage of these areas must be reflected within the submitted syllabi. Please note the importance of furnishing the syllabi along with the application, which provides the reviewer with the greatest insight into core content area coverage.

Questions 14 and 15 reference CACREP accreditation. The following information is provided to answer questions 14 and 15.

If we already have CACREP School Counseling certification, does that allow any reduction in having to re-register the program with the state?

14. CACREP core areas and the areas that NYS expects differ in some ways, how much latitude is there for programs that are CACREP accredited in school?

Answer: All new programs proposed in school counseling, designed to lead to initial and/or professional certification must meet the applicable standards set forth in Commissioner's Regulations, including Part 52.21(d), regardless of whether the program is CACREP accredited or accredited by any other national accrediting body.

15. Best practices is not defined by the state nor by CACREP, CAEP, or MPCAC. How best to proceed?

Answer: Best practices change over time. Commissioner's regulations require all faculty members who teach within a curriculum leading to a graduate degree to possess earned doctorates or other terminal degrees in the field in which they are teaching or to demonstrate their special competence in the field in which they direct graduate students. It is therefore expected that qualified faculty will be familiar with best practices in their discipline and that institutions have policies in place to evaluate the knowledge and success of their faculty in preparing their graduate students in their discipline.

NYSED also requires that programs leading to certification as a school counselor meet Commissioner's Regulations Part §52.21(d)(5) regarding program accreditation. All school counseling programs first registered to lead to initial and/or professional certification must be accredited by an acceptable professional education association, within seven years of the date of their Initial registration, and continuously accredited thereafter. The requirement for accreditation further ensures institutions will remain current and meet or exceed current discipline standards of best practices.

16. With multiple changes at the top in key NYSED leadership, who will be our main contacts for this going forward as of January 1?

Answer: The Office of College and University Evaluation should be contacted with questions regarding the regulations or program registration for all programs leading to school counseling certification. All proposals should be directed to your institution's Chief Executive Officer (CEO) or their designee. The CEO or designee will then communicate with the Office of College University Evaluation (OCUE) via OCUEINFO@NYSED.gov to ask questions regarding program registration requirements or registration processes and OCUEdapps@NYSED.gov to submit applications requesting approval to modify currently registered programs or to offer new programs. If you do not know the OCUE point-of-contact at your institution, contact the Vice President of Academic Affairs or Provost at your institution for that information.

17. Once we have our re-registration in to the state, how long until we will hear back?

Answer: The Department is committed to reviewing proposals submitted by the deadline of March 1, 2021, and to register them in time to meet the new regulations by September 1, 2021. Please note that a timely review by the Department requires submission of complete applications. Incomplete or insufficient application/materials or an institution's failure to respond to Department questions in a timely manner will result in a delay in review and subsequent delay in program registration.

18. Given that the Permanent can only be obtained after two years of working as a SC, does this mean that institutions can recommend candidates who complete the two years of work after February 1, 2023 but only until the Department deems this can no longer be done?

Answer: Candidates should be recommended for permanent certification when they complete a program that is registered to lead to permanent certification. The institution should be submitting the recommendation independent of the candidate's work experience. The Office of Teaching Initiatives monitors work experience, it is not the responsibility of the IHE's.

And is there any thought of when the Department might make this determination?

Answer: Not at this time.

19. Can programs switch students from a Provisional/Permanent registered program into the new Initial/Professional program, basically, a change of "major" or "change of program" internally. (e.g., student begins the program in Fall 2020 part-time; they will not have met all the requirements for the Provisional by February 1, 2023). See page 6, # 11 & #12 of Q&A.

Answer: Whether a student is permitted to transfer from one program to another program at an institution should be dictated by established policies at the institution. Commissioner's regulations require that such policies regarding the admission of students to specific curricula be established, published and explicit to ensure they are applied equitably. It is the institution's responsibility to ensure that candidates meet all of the admission requirements and complete all of the program requirements for the program they are enrolled in. As stated in the answer to question 9 in the Q and A, "While regulations do not prevent candidates with Provisional school counselor certification from being admitted into programs registered to lead to Initial or Initial/Professional certification, institutions cannot recommend these candidates for Initial or Initial/Professional certification unless the candidates have completed all program requirements for Initial and/or Professional certification. This includes completing the 100-hour practicum and 600-hour internship and their required components". Additionally, Commissioner's Regulations require candidates entering 12-semester hour Professional certification programs to hold Initial certification. [See §52.21(d)(3)(i)]

20. Should all students apply for provisional certification as soon as they qualify (e.g., student begins in fall 2020, new regs go into effect fall 2021, deadline for applying for provisional is February 1, 2023--therefore, provisional must be applied for before they complete the program.

Answer: It is the institution's responsibility to ensure that candidates are informed of the 2/1/2023 application deadline for provisional school counselor certification. If candidates have met all requirements for provisional certification before 2/1/2023, but have not completed their preparation program, and they wish to be provisionally certified, they must apply for certification through the Office of Teaching Initiatives- Individual Evaluation pathway.

21. Will there be arrangements for a smoother application for provisional for students still in a program--currently, they need to apply on their own. Is it possible to have them apply through the institution to facilitate the process?

Answer: Institutions cannot enter certification recommendations until candidates have completed all the academic requirements of their registered program. This requirement is governed by regulation and will not be changed.