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Key Policy Letters from the Education Secretary and Deputy Secretary
June 30, 2014

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Dear Colleague:

As educators across the country work to empower all students to meet the academic and career preparation demands of the 21st century, the role of school counselors has never been more important. School counselors are often the vital link between students' aspirations for the future and tangible opportunities for postsecondary success. They are also particularly important for our neediest students, who require expert and accessible guidance as they navigate a challenging and complicated college admissions and career preparation landscape. As State and local educational agencies (SEAs and LEAs) prepare for the start of the 2014–2015 school year, I want to call attention to the urgent need for highly effective school counselors and discuss the importance of amplifying the impact of school counselors on students' academic success, social-emotional well-being, and college and career readiness.

If the nation is to meet President Obama's goal of having the highest proportion of college graduates in the world by 2020, it is imperative that all students have consistent access to school counselors who possess the training and skills to help students reach their highest aspirations. School counselors are pivotal in helping students manage their academic programs as well as the inevitable life events that may threaten students' ability to succeed in school. Yet, as the Civil Rights Data Collection recently found, one in five American high schools operates without any school counselors on staff (<http://www.ed.gov/blog/2014/03/five-new-facts-from-the-civil-rights-data-collection/>). This is an untenable situation for millions of students who need the support of site-based school counselors, whose job it is to ensure their students' success.

Schools that do employ counselors may not use them to full advantage. Despite the critical role school counselors play in supporting students' college and career readiness, they often are asked to perform many "non-counseling" duties that can distract from their core work and ultimately leave students without the individualized attention they need to complete their academic course work, successfully navigate the college admissions and financial aid processes, and/or prepare for productive careers. Increasing the number of students who graduate from high school ready for college and careers requires that all students benefit from a holistic support system that ensures consistent access to effective school counselors.

Schools and LEAs should support their school counselors by providing them with the time, space, and resources they need to work effectively on behalf of students, while also holding them accountable for

measurably improving the college and career readiness of the students they serve. Doing this well will require that SEAs and LEAs make wise investments in professional development for school counselors, create or provide data platforms that can enable school counselors to extend their impact and reach all students, and provide high-quality training for principals and teachers so they understand how to most appropriately utilize and build on the capacities of school counselors.

Additionally, schools and LEAs can further support student success by engaging school counselors in a leadership capacity to serve as trainers and providers of professional development designed to improve all educators' understanding of the college awareness, admissions, and financial aid processes. This strategy could help school counselors focus their energies on meeting students' academic, social-emotional, and college- and career-readiness needs, especially those of the many first-generation college-bound students who are now graduating from our high schools. A systemic and sustainable approach to supporting school counselors in meeting increased professional demands should include a consideration of how federal funds and programs can help improve and expand the reach of school counselors. To that point, please find attached a list of federal initiatives and programs that may support the hiring, development, and retention of effective school counselors, including school counselor-led professional development activities.

Decades of professional experience confirm—and an emerging body of research indicates—that school counselors play a critical role in helping to ensure that our nation's students graduate from high school ready for college and careers. Without the support of school counselors, millions of students would neither graduate from high school nor fulfill the essential requirements of the college admissions and financial aid processes. I urge SEAs and LEAs to use the summer months to strategize and develop policies and programs that enable school counselors to become more effective at helping greater numbers of students—especially low-income students, minority students, students with disabilities, and English learners—successfully access postsecondary education or career opportunities.

I am grateful to you and our nation's school counselors, who strive to meet the varied and complex needs of students and their families.

Sincerely,

/s/

Arne Duncan

Enclosure

Federal Programs and Support for School Counselors

The U.S. Department of Education (ED) administers a number of programs that a State educational agency (SEA) or local educational agency (LEA) may leverage to provide support for school counselors. Below is a listing of the major federal programs whose funds may be used to support school counselors, links to the relevant program Web sites, and a brief description of how funds under each program might be used.

Please be aware that the use of funds to support school counselors must meet the applicable requirements of each program. For example, the use of funds must be consistent with allowable costs, including the applicable cost principles. In addition, a number of programs contain a requirement that federal funds be used only to supplement, and not supplant, funds from non-federal sources that would, in the absence of the federal funds, be available for particular activities.

Elementary and Secondary School Counseling Programs

The [Elementary and Secondary School Counseling program \(ESSC\)](#) provides competitive grants to enable LEAs to establish or expand school counseling programs. The ESSC statutory authority permits LEAs to use grant funds for the counseling of elementary and secondary students on postsecondary topics such as the high school courses students need to take in order to prepare for college, as well as on academic and career planning. Professional development for school counselors is generally an allowable use of program funds.

FAFSA Completion Initiative

In March 2014, President Obama announced the launch of the [FAFSA Completion Initiative](#) aimed at increasing the number of students who complete their FAFSAs and, thus, boosting the number of students who are able to fulfill their college and career aspirations. The FAFSA is a critical gatekeeper on the road to college and other postsecondary opportunities. The FAFSA Completion Initiative cannot be successful, however, without school counselors' support and engagement. To contribute to the success of this initiative, ED has released a suite of resources to support school counselors in their work of driving FAFSA completion and will soon begin partnering with SEAs, enabling them to begin sharing valuable, real-time information with schools and LEAs on student progress in completing the FAFSA. In addition, in December 2013, ED's Federal Student Aid office launched the [Financial Aid Toolkit](#) to help counselors understand the basics of federal student aid, provide tips on hosting events (along with sample PowerPoint presentations), provide suggested messages for social media and e-mail outreach, and help find other training opportunities.

Improving Basic Programs Operated by Local Educational Agencies (Title I, Part A)

The [Title I, Part A program](#) focuses on improving the academic achievement of low-achieving students in schools with high concentrations of children from low-income families. There are two types of Title I programs: schoolwide programs and targeted assistance programs. How Title I, Part A funds may be used depends on the type of program.

Title I Schoolwide Programs:

- A schoolwide program must include schoolwide reform strategies that, among other requirements, address the needs of all children in the school, but particularly the needs of low-achieving children as identified in the school's comprehensive needs assessment and articulated in its schoolwide plan. When supported by the needs assessment, college and career awareness and preparation, such as college and career guidance or professional development for school counselors, may be part of a schoolwide plan and Title I funds may be used to support such activities.

Title I Targeted Assistance Programs:

- A Title I school operating a targeted assistance program may use its Title I funds for professional development that is related to the needs of participating Title I students and is provided to staff who work with those students. Therefore, a school using Title I, Part A funds to operate a targeted assistance program may elect to use part of its funding to support professional development for school counselors if this professional development is focused on improving the college and career readiness of Title I participating students, and such services are otherwise not available for all students.

Please refer to ED's nonregulatory guidance on the use of Title I, Part A funds (available at: <http://www2.ed.gov/policy/gen/leg/recovery/guidance/titlei-reform.pdf>) for additional information on determining whether a particular use of Title I, Part A funds is allowable.

Improving Teacher Quality State Grants Program (ESEA Title II, Part A)

The purpose of the [ESEA Title II, Part A program](#) is to increase academic achievement by improving teacher and principal quality. The funds from ESEA Title II, Part A may also be used to support pupil services personnel (*including* school counselors) in very specific circumstances.

Provisions related to LEAs:

- LEAs may use Title II, Part A funds to develop and implement “mechanisms to assist schools in effectively recruiting and retaining highly qualified teachers, principals, and pupil services personnel” (Section 2123(a)(1)). This provision includes activities designed to recruit and retain school counselors. For example, if an LEA uses Title II, Part A funds to provide professional development activities focused on “effective instructional strategies, methods, and skills, and use of challenging State academic content standards and student academic achievement standards, and State assessments” (Section 2123(a)(3)(A)(ii)) as a recruitment and retention strategy for highly qualified teachers and principals, school counselors may also be included in such activities.

However, the funds may only be used for pupil services personnel if (1) 100 percent of an LEA's teachers of core academic subject classes are highly qualified (Section 1119(a)(2)); and (2) the mechanisms used to recruit and retain pupil services personnel are consistent with those used to help schools effectively recruit and retain highly qualified teachers and principals (Section 2123(a)(1)). An LEA may use Title II, Part A funds for recruitment efforts (e.g., job fairs) that focus on pupil services personnel, but may not use those funds to provide financial or other personal incentives to these personnel if they accept a position working in the LEA.

- LEAs may use Title II, Part A funds to carry out programs and activities designed to improve the quality of the teacher force and to improve the quality of principals and superintendents (Sections 2123(a)(5) and 2123 (a)(6)). LEAs may therefore use Title II, Part A funds to fund school counselor-led professional development activities for teachers, principals, and superintendents that focus, for example, on helping them to ensure all students achieve academically and are college- and career-ready.
- LEAs may use Title II, Part A funds to provide training in how to teach and address the needs of students with different learning styles, particularly students with disabilities, students with special

learning needs, and English learners, as well as training in methods to improve student behavior in the classroom and identifying early interventions to help students with special needs, such as those mentioned above (Section 2123(a)(3)(B)). Capable school counselors could provide such training.

Provisions related to SEAs:

- SEAs may use their Title II, Part A funds for the same activities listed above for LEAs, with the same conditions (Section 2113(c)(4)).
- SEAs may use Title II, Part A funds to include pupil services personnel in its professional development activities if the SEA determines participation is appropriate (Section 2113(c)(6)).

Finally, SEAs and LEAs should note that, although sections 2113(c)(4) and 2123(a)(2) of Title II, Part A permit SEAs and LEAs to provide financial and other incentives to hire highly qualified teachers—and SEAs and LEAs may target these incentives, for example, on those who likely would be most effective in increasing student achievement—this provision does not extend to pupil services personnel.

McKinney-Vento Education for Homeless Children and Youth Program

The [Education for Homeless Children and Youth \(EHCY\) program](#) is authorized under Title VII, Subtitle B of the McKinney-Vento Homeless Assistance Act (McKinney-Vento Act) and is designed to address the challenges that homeless children and youth face in enrolling, attending, and succeeding in school. Consistent with the purpose of the program, an LEA receiving a subgrant may use EHCY funds to support counseling services for students experiencing homelessness that expand upon or improve services provided as part of the regular educational program.

For example, section 723(d)(12) of the McKinney-Vento Act specifically authorizes the use of EHCY funds for pupil services, which may include counseling for students experiencing homelessness related to their academic, social-emotional, and college- and career-readiness needs. In addition, section 723(d)(3) of the McKinney-Vento Act provides that EHCY funds may be used for professional development and other activities for educators and pupil services personnel, including counselors, to heighten the understanding of the needs and rights of homeless children and youth. Additional information regarding the EHCY program is available at <http://www2.ed.gov/programs/homeless/legislation.html>

Prevention and Intervention Programs for Children and Youths Who Are Neglected, Delinquent, or At Risk

The [Prevention and Intervention Programs for the Education of Children and Youth Who Are Neglected, Delinquent, or At-Risk under Title I, Part D of the ESEA](#) include two programs: the State agency program (Subpart 1) and the local educational agency program (Subpart 2). These programs are designed (1) to improve educational services for neglected or delinquent children and youth so that they have the opportunity to meet the same challenging State academic content and achievement standards that all children in the State are expected to meet; (2) to provide services needed to make a successful transition from institutionalization to further schooling or employment; and (3) to prevent at-risk youth from dropping out of school.

With respect to the Subpart 1 State agency program, section 1418 of the ESEA requires that a State agency receiving a subgrant reserve 15-30 percent of grant funds for transition services to help children and youth who are neglected reenter school successfully or find employment after they leave a State-operated institution. These transition services may include counseling services as well as college program placement services; information concerning, and assistance in obtaining, available student financial aid; and job placement services. More generally, Subpart 1 funds may be used to hire additional educational staff, including counselors.

The Subpart 2 local educational agency program authorizes SEAs to make subgrants to LEAs with locally operated residential institutions for neglected or delinquent children or youth within their boundaries. Under section 1424 of the ESEA, an LEA receiving a Subpart 2 subgrant may use grant funds for counseling, including mental health counseling, drug and alcohol counseling, and career counseling, and in assisting eligible at-risk children and youth in securing student loans or grants for postsecondary education.

Additional information regarding Title I, Part D is available at <http://www2.ed.gov/programs/titleipartd/legislation.html>

School Improvement Grants

[School Improvement Grants \(SIG\)](#) provide support to turn around a State's lowest-achieving schools. States must award their SIG funds directly to LEAs that demonstrate the greatest need for the funds and the strongest commitment to using those funds to raise substantially the achievement of students by implementing rigorous intervention models in their persistently lowest achieving Title I schools, as well as secondary schools that are eligible for, but do not receive, Title I funds.

The SIG final requirements require participating schools to implement one of four school intervention models: (1) the "turnaround" model; (2) the "restart" model; (3) school closure; and (4) the "transformation" model. A school implementing the "transformation" or "turnaround" model is required to provide ongoing high-quality, job-embedded professional development that is aligned with the school's comprehensive instructional program and designed with school staff to ensure that they are equipped to facilitate effective teaching and learning and have the capacity to successfully implement school reform strategies. Under the "restart" model, professional development is an allowable activity. Thus, the use of SIG funds to provide professional development to school counselors is generally allowable in a school that is implementing one of these three school intervention models, each of which represents a comprehensive approach to addressing the needs of the students in a school as identified through the LEA's needs assessment.

SIG funds can be used to support a myriad of activities as part of a comprehensive approach to turning around a school; it is possible that those activities could include hiring school counselors or expanding school counseling resources, etc. Any activity would need to be directly related to the full and effective implementation of the selected model consistent with the LEA's approved SIG application, address the needs identified in the needs assessment required by the SIG final requirements, and advance the overall goal of the SIG program of improving student academic achievement in the school.


Please refer to question I-30 in ED's SIG guidance (available at: <http://www2.ed.gov/programs/sif/sigguidance03012012.doc>) and the SIG final requirements, as

published in the *Federal Register* (available at: <http://www2.ed.gov/programs/sif/2010-27313.pdf>), for additional information regarding the factors to be considered in determining whether a particular use of SIG funds is allowable.

21st Century Community Learning Centers Program (Title IV, Part B)

The [21st Century Community Learning Centers \(CCLC\) program](#) supports the creation of community learning centers that provide opportunities for academic enrichment through a variety of activities during non-school hours for children, particularly students who attend high-poverty and low-performing schools. 21st CCLC funds may be used to support a variety of counseling programs, including, for example, school counseling staffs serving in the role of after-school college and career prep advisors or other roles supporting academic or enrichment activities.

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Last Modified: 07/02/2014