



August 13, 2025

Office of Elementary and Secondary Education
Department of Education
Docket ID ED-2025-OESE-0153
90 FR 33349
34 CFR Chapter II
2025-13385

RE: Proposed Rule: Mental Health Services Professional Demonstration Grant Program Proposed Priorities

Dear Secretary McMahon:

Executive Summary

We, the undersigned national counseling organizations, commend the U.S. Department of Education for recognizing the critical need to address the school psychologist shortage through the *Mental Health Services Professional Demonstration Grant Program*, and we respectfully urge the Department to expand these priorities to include school counselors as essential mental health professionals as well.

- The Department's proposed mental health workforce priorities currently overlook school counselors, a vital part of comprehensive school mental health systems.
- School counselors provide services to all students and serve as vital resources for teachers, administrators, families, and other members of the school community.
- School counselors provide early intervention, prevention, and other essential psychoeducation services through individual counseling, classroom sessions, and group counseling, ensuring that they reach the complete community of students efficiently and effectively.
- While addressing the 1065:1 student-to-psychologist ratio, the proposal ignores the equally severe shortage of school counselors affecting millions of students. These professionals are prepared to meet the needs of the broad student community.
- Research shows that school counselors significantly improve academic achievement, graduation rates, and college enrollment.
- School counselors provide wide-ranging preventative services across all intervention levels, while psychologists offer specialized intensive care.
- A comprehensive approach to school mental health needs a multifaceted workforce with complementary skills, and school counselors are a crucial part of this continuum of care.
- We suggest the Department expand all three priorities to include both professions, maximizing the impact of federal investments and ensuring comprehensive mental health support for students.

The State of Student Mental Wellness and Well-Being

Health concerns are on the rise among youth, contributing to a growing need for school-based mental health services. Keeping students in their classrooms and engaged in learning requires attending to their mental health needs, and school counselors are prepared to provide that attention and necessary services. School psychologists and school counselors work collaboratively to meet mental health needs impacting the school community, with school counselors playing a vital role in delivering necessary prevention and intervention services in classroom, group, and individual settings. The Department's focus on addressing the 1065:1 student-to-school psychologist ratio is commendable, but this represents only one dimension of the workforce shortage crisis facing America's schools (Sohn, 2024). Workforce development to ensure that schools and students have access to prepared and effective school counselors is necessary to offer vital integrated student support services within the school system. School psychologists and school counselors work closely together, and programs designed to expand the mental health workforce in school settings will be most successful if those programs include both school psychologists and school counselors.

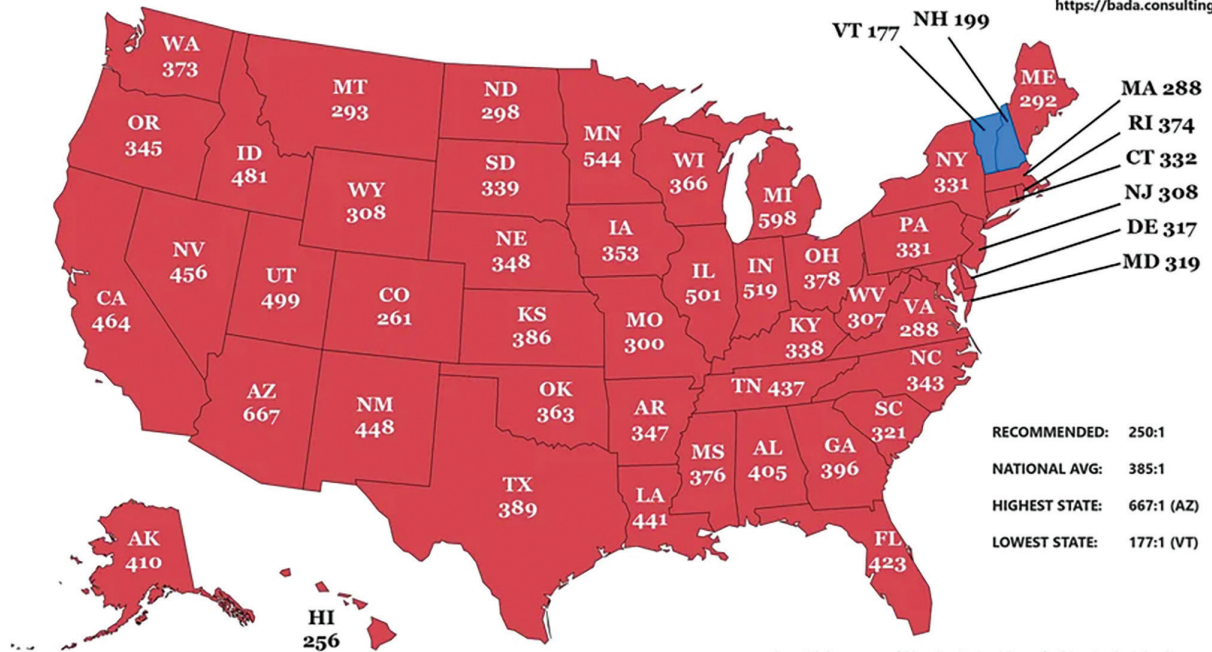
The American School Counselor Association (ASCA) recommends a 250:1 student-to-counselor ratio, yet many schools fall far short of this standard (American School Counselor Association, 2023c). It has been reported by ASCA that the national average of students per caseload is 408. Some states have higher ratios, with some exceeding 600 students per counselor (ASCA, 2023b). Descriptive studies have found that high caseloads are negatively associated with student outcomes, including academic achievement and postsecondary enrollment (Savitz-Romer & Nicola, 2022). The current school counselor workforce shortage affects millions of students who could benefit from comprehensive mental health support services. The Department of Education's *Mental Health Services Professional Demonstration Grant Program* will help to strengthen the school-based mental health workforce by increasing the number of school psychologists. To be most effective, it is critical to include school counselors.

Nationwide Students per School Counselor by State

Legend ● MEETING RECOMMENDATION ● NOT MEETING



<https://bada.consulting>



Data: U.S. Department of Education, National Center for Education Statistics, Common Core of Data (CCD), State Nonfiscal Public Elementary/Secondary Education Survey.

Addressing Workforce Development Challenges

Training and Pipeline Development

The proposed priorities focus exclusively on school psychology graduate candidates, but this approach overlooks the significant potential of school counselor preparation programs. School counseling programs typically require a master's degree and can be completed in 2–3 years. School counselors receive extensive training that includes direct hands-on experience with students in school settings, equipping them to effectively support student needs from their very first day on the job. This foundational preparation is continually enhanced through ongoing professional development, ensuring counselors remain responsive to the evolving challenges students face and are well-positioned to promote their academic and emotional success.

Cost-Effectiveness and Sustainability

According to reporting from *The 74*, a nonprofit news organization exclusively focused on education in the United States, Colorado spent **\$16 million** on its School Counselor Corps Grant Program, and this investment is estimated to have saved the state **over \$300 million** in social safety net services. This amounts to a savings of **\$20 for every \$1 spent** on lowering counselor caseloads. This return on investment demonstrates the fiscal wisdom of investing in school counseling services (Savitz-Romer & Nicola, 2022).

School Counselors: A Distinct and Essential Health Care Profession

Unique Role and Scope of Practice: School counselors provide services for students who need ongoing support with specific issues like grief, trauma, depression, anxiety, bullying, as well as academic support. Recent studies highlight the effectiveness of school counselors in addressing student mental health needs, particularly through early intervention and preventative programs (Warren et al, 2024). School-based mental health treatment has been shown to be effective for various disorders like anxiety, oppositional defiant disorder, and ADHD (Piffner & Haack, 2014). School counselors play a crucial role in providing support, promoting mental awareness, and removing barriers to student success (ASCA, 2019).

Early Identification: School counselors are often the first point of contact for students experiencing mental health challenges and can play a vital role in early identification and intervention (Johnson et al, 2023).

Direct Support: They provide individual and group counseling, social-emotional learning, and other support services (William & Mary School of Education, 2023).

Collaboration: School counselors collaborate with teachers, administrators, parents, and other professionals to create a supportive and coordinated system of care for students that promotes well-being (ASCA, 2019).

Policy Support: School Counselors are experts in providing policy makers with guidance on how to improve school programs that support the overall health and well-being of the school community.

Addressing Root Causes: Counselors can also address the root causes of mental health challenges, such as nonmedical causes of health, to promote long-term mental health and well-being (Johnson et al, 2023).

Because of their unique position within a school and their unique training, school counselors support students facing academic difficulties, mental health issues, and family and social concerns, as well as provide career exploration and course planning to make school relevant. This broad scope allows school counselors to serve as the first line of identification and intervention for students experiencing mental health challenges.

Evidence-Based Impact on Student Outcomes

Extensive research demonstrates the effectiveness of school counselors in improving student outcomes across multiple domains:

Social-Emotional Outcomes: One study of over 22,600 middle school students found positive outcomes among those attending schools with more comprehensive counseling programs. Children in those schools had fewer socializing problems, achieved higher grades, and felt safer attending school (Lapan et al, 2001). A meta-analysis of 107 studies on school counseling outcomes involving 132 mental health treatment interventions found that counseling had a significant positive impact on students who received appropriate counseling interventions compared to those who didn't access counseling services (Baskin et al, 2010). As implementation specialists, school counselors are uniquely equipped to ensure that students' mental health needs are properly identified and addressed through comprehensive programs. (Warren et al, 2024). The positive effects of school counselors on student mental health and wellness outcomes are well documented through numerous anecdotal reports and empirical studies (see ASCA, nd-a; n.d.-b).

Academic Achievement: School counselors contribute to the educational and academic outcomes of the school by enhancing student engagement and performance (Akos et al., 2019; Shi & Brown, 2020) through designing, implementing and assessing school counseling programs (ASCA, 2023a). Studies show that comprehensive school counseling programs are directly linked to student academic achievement. K–12 students enrolled in schools with comprehensive counseling programs for at least 3 years produce higher academic achievement than those who are not enrolled in schools with such programs (Carrell & Hoekstra, 2014; ASCA, 2019; and Carey & Martin, 2015).

Postsecondary Success: Research consistently shows that students who engage with counselors are more likely to complete college applications, enroll in postsecondary education, and achieve better academic and behavioral outcomes. For example, a minority student assigned to an effective counselor is 3.2 percentage points more likely to graduate high school and 2.2 percentage points more likely to attend college. Low-achieving students assigned to an effective counselor are 3.4 percentage points more likely to graduate and 2.5 percentage points more likely to attend college (Hurwitz & Howell, 2014; Goodman 2019, and Mulhern, 2020).

Access for All: These results indicate that counselors may be an important resource for closing racial and economic gaps in college completion. This support is particularly notable in communities with higher rates of poverty. Research correlates student-to-counselor ratios with better academic outcomes for students in high-poverty communities (Savitz-Romer & Nicola, 2022).

Complementary Roles in Comprehensive School Mental Health

Multi-Tiered Systems of Support and Wraparound Services: Results suggest that school counselors and psychologists share many of the competencies needed to implement comprehensive school mental health systems, but the breadth and depth of their unique and specialized skillsets in mental health are often underutilized (Zabek et al, 2022). Thus, opportunities exist for schools to leverage their current workforce to increase access to school mental health services via school counselors and psychologists.

School counselors operate across all tiers of intervention (universal prevention, targeted intervention, and intensive support).

Early Identification and Referral: When a counselor identifies that a student may benefit from more advanced mental health evaluation, they can leverage their expertise to collaborate with medical professionals and other community-based supports. School counselors play a pivotal role in initiating and coordinating wraparound services that address the holistic needs of students, fostering both mental well-being and improved academic performance.

Recommended Modifications to Proposed Priorities

Priority 1 Revision: Expand to “Enhance State Educational Agency (SEA) efforts to address shortages of school mental health professionals, including school psychologists and school counselors, in high-need Local Education Agencies (LEA).”

Priority 2 Revision: Modify to “Expand the capacity of high-need LEAs to address shortages of school mental health professionals, including school psychologists and school counselors.”

Priority 3 Enhancement: Include school counselors in intensive mental health services delivery, recognizing their training in crisis intervention, individual and group counseling, and case management.

Implementation Considerations

Partnership Requirements: The proposed partnership requirements should explicitly include school counseling programs alongside school psychology programs. Many institutions offer both programs and could develop innovative collaborative training models that more efficiently prepare professionals to work effectively within comprehensive school mental health teams.

Definition Clarifications: The proposed definitions should be expanded to include “credentialed school counselor” and “school counseling graduate candidate” to ensure these essential professionals are recognized within the grant framework.

Data Collection and Evaluation: Grantees should be required to collect data on the full spectrum of mental health services provided, including those delivered by school counselors, to demonstrate the comprehensive impact of federal investment in school mental health workforce development.

Conclusion

The mental health crisis facing America's students requires a comprehensive workforce response that leverages all available mental health professionals in schools. While school psychologists play a crucial specialized role, school counselors provide the broad-based, accessible, and preventative services that form the foundation of effective school mental health systems, resulting in a well-rounded and well-prepared student.

Most importantly, however, they create trusting relationships centered on support, advocacy, and an assurance that they are first and foremost concerned with the well-being of all students. These relationships, combined with school counselors' unique training in academic, career, and social-emotional development, make them indispensable partners in addressing the workforce shortage and the health care crisis within the nation's school systems.

We urge the Department to expand these priorities to create a truly comprehensive approach to school mental health workforce development that includes school counselors. Such an approach would maximize the impact of the federal investment while ensuring that all students have access to the full continuum of support services they need to succeed academically, socially, and emotionally, preparing students for college and the workforce.

The data is clear: school counselors make a significant, measurable difference in student outcomes. By including them in this critical workforce development initiative, the Department can help ensure that more students receive the comprehensive mental health support they deserve.

Sincerely,

National Board for Certified Counselors and Affiliates (NBCC)

American Counseling Association (ACA)

Association for Counselor Education and Supervision (ACES)

American Mental Health Counselors Association (AMHCA)

Council for Accreditation of Counseling and Related Educational Programs (CACREP)

Chi Sigma Iota Counseling Academic & Professional Honor Society International (CSI)

International Registry of Counsellor Education Programs (IRCEP)

National Association of Black Counselors, Inc. (NABC)

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APPENDIX – KEY DATA POINTS

ASCA advises a 250:1 student-to-counselor ratio for optimal support.

American School Counselor Association. (2023c, September). School counselor shortages. *Current Issues in Education*. <https://www.schoolcounselor.org/getmedia/f73304ab-5ac5-4ba5-8342-826a3bc205a2/CIE-Employment-Shortages.pdf>

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APA highlights that there is a 1,065:1 student-to-school-psychologist ratio.

Sohn, E. (2024, January). *There's a strong push for more school psychologists*. American Psychological Association. <https://www.apa.org/monitor/2024/01/trends-more-school-psychologists-needed>

22,600 middle school students experienced positive outcomes among those attending schools with more comprehensive counseling programs.

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Savitz-Romer, M., & Nicola, T. P. (2022). *Building high-quality school counseling programs to ensure student success. Overview brief: Student mental health and well-being*. EdResearch for Action, Brief 21. <https://edresearchforaction.org/research-briefs/building-high-quality-school-counseling-programs-to-ensure-student-success>