



Frequently Asked Questions

Leveraging the Comprehensive School Counseling Program

VERSION 1.0



OREGON
DEPARTMENT OF
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Frequently Asked Questions

Companion Guide to ODE's District Guidance on Counseling Program Personnel Requirements

Overview

This document clarifies who can design, deliver, and implement comprehensive school counseling programs, in accordance with [ORS 329.603](#), [OAR 581-022-2060](#), and ODE's District Guidance on Counseling Program Personnel Requirements. Start by reading the District Guidance, then consult this companion guide with further questions.

The FAQ is organized into broad categories to help districts navigate to what they need for determining counseling staff and hiring approaches. Commonly used acronyms appear below.

Acronym	Expansion
CDS	Child Development Specialist
CSCP	Comprehensive School Counseling Program
LCSW	Licensed Clinical Social Worker
LPC	Licensed Professional Counselor
MTA	Multidisciplinary Team Approach (also called counseling staff)
OAR	Oregon Administrative Rule
ODE	The Oregon Department of Education
ORS	Oregon Revised Statute
QMHP	Qualified Mental Health Provider
SSW	School Social Worker
TSPC	Teacher Standards and Practices Commission



Key Roles: Are We in Compliance?

Use the following to determine compliance with the personnel requirements for the Division 22 rule. First, identify who is working in the school in the counseling program; then check the role they were hired or serve in:

Who is working in the counseling program?	Hired / Working as...	Result
TSPC-licensed School Counselor	a School Counselor	In compliance
TSPC-licensed School Social Worker	a School Social Worker	In compliance
TSPC-licensed School Social Worker, Child Development Specialist, Limited Student Services License, School Psychologist, or other staff role	a School Counselor	Out of compliance (ORS 329.603; OAR 581-022-2060; TSPC OAR 584-245-0310, 584-245-0400)
Another TSPC-licensed professional trained in CSCP	part of the counseling staff/team	In compliance
Another staff person NOT licensed by TSPC	part of the counseling staff/team	In compliance
Another staff person NOT licensed by TSPC	lead for the CSCP	Out of compliance

Key Points:

- If a TSPC-licensed School Social Worker is hired to fill a School Social Worker position, the district is in compliance and shall have a job description reflecting the School Social Worker role and TSPC scope of license.
- A person holding a School Social Worker license shall not substitute as a School Counselor for more than three consecutive months without the School Counselor license, shall not accept any

full- or part-time School Counselor position, shall not go by the title of School Counselor, and shall not work within the scope of license for a School Counselor.

- If a CDS, School Psychologist, QMHP, LCSW, LPC, or other non-TSPC-licensed staff member works in the school or is contracted by the district to work in the school, they may serve as part of the counseling staff/team. The administrator must still identify one or more professionals who are TSPC-licensed to serve on the counseling team to be in compliance with [OAR 581-022-2060](#).
- In some cases the building administrator can serve as the TSPC-licensed lead when trained in how to design, deliver, and implement a program. In this case, the assigned lead will rely on the multidisciplinary counseling team approach to provide services and supports.
- If no TSPC-licensed staff trained in CSCP are in the school, identify someone at the district or ESD trained to support the team.

Note: Even when a TSPC-licensed school counselor or school social worker is leading the program, it is required in rule and best practice to work in collaboration with other staff to implement the program in support of reaching its goals.

Who Leads the Program?

Q. Who leads the design, delivery, and implementation of the CSCP?

A. An administrator may select one of three options to lead:

1. A TSPC-licensed School Counselor who is trained in how to design, deliver, and implement the CSCP, and hired as a School Counselor.
2. A TSPC-licensed School Social Worker who is trained in how to design, deliver, and implement the CSCP, hired as a School Social Worker, and assigned to a school to provide CSCP services and supports.
3. A Counseling Team led by someone licensed by TSPC and trained in how to design, deliver, and implement the CSCP (who may or may not be a school counselor or social worker), and is supported by a multidisciplinary team of professionals.

The three options provide districts and schools with flexibility in their hiring and lead assigning, while ensuring the CSCP is led by those who are professionally trained or experienced in helping the program maintain fidelity and fulfill its goals.

What are the Three Approaches?

Q. What are the three approaches a district can take for the design, delivery, and implementation of the CSCP?

A. [ORS 329.603](#) identifies the key roles: (1) a TSPC-licensed School Counselor, (2) a TSPC-licensed School Social Worker, or (3) any combination of persons qualified to implement the program as defined in [OAR 581-022-2060](#). The OAR identifies a counseling team approach that includes one or more TSPC-licensed professionals whose members as a whole have training or experience in Oregon's Framework, counseling methodologies, social-emotional learning, mental and behavioral health supports, trauma-sensitive practices, culturally responsive and sustaining practices, curriculum/instruction/assessment, and career development.

The Role of Leads

Q. What does the lead do that is different from other roles?

A. The CSCP lead is part of the counseling team, is licensed by TSPC, and is trained in how to design, deliver, and implement the program. The lead coordinates planning, implementation, and improvement with the team and works with their supervisor to ensure program components, resources, and personnel are in place, supported, and in compliance with OAR 581-022-2060.

Q. Can anyone with a TSPC license lead the CSCP?

A. No. The lead is a TSPC-licensed staff member who is part of the counseling team and trained in how to design, deliver, and implement the program.

Q. Who determines the licensed TSPC staff member to lead?

A. The building administrator is responsible for assigning responsibilities and works with the CSCP team to clearly define the scope and role of each team member, identify strengths and training gaps, support staff in getting additional training, and determine who else should join the team to fill gaps, including community and agency partners who can provide mental health services and long-term counseling.

Q. Must the lead be on-site full time?

A. No. A CSCP lead might work in two or more buildings and serve as the lead at one or more schools.

Q. Do they need to be licensed to be employed, or can they be working on it?

A. Staff working toward a degree or certification play an important role on the counseling team, but they cannot serve as the lead unless TSPC-licensed (including an emergency or restricted license) with the training or experience to manage the program.

Team Approach to Comprehensive School Counseling Programs

Q. What defines the team approach?

A. A multidisciplinary combination of individuals, each bringing unique expertise, training, and experience, working together to support full implementation. At least one or more are licensed by TSPC, while the combined counseling team has the professional training or experience to implement the CSCP. Members may include child development specialists, state-licensed counselors or social workers, mental

health providers (QMHP, LCSW, LPC), career advisors, or classroom educators. Unless also TSPC-licensed and trained in the CSCP, these staff are counseling staff members but cannot serve as the required TSPC-licensed professional.

Each person works within the scope of their license or certification and their school role. With the counseling staff/team approach, each member brings their background training, and expertise to their role, all contributing to implementation of all the components of the program through collaboration, partnership, and consultation. Each member works within their scope of license or certification. Some counseling staff may have unique and overlapping areas of expertise that can strengthen the program services and supports provided.

The building administrator should work with the counseling team to clearly define the roles and responsibilities of each team member, and how they work together to implement the program. It is important for schools to provide coordinated services. At schools with both school counselors and school social workers, school counselors will have clearly defined roles and responsibilities, while the school social worker will have other defined roles and responsibilities, both within the scope of the license.

Q. What if we use contracted specialists for some services?

A. Contracted staff may have different FERPA/HIPAA requirements than district-hired staff. Be attentive to differing privacy, documentation, and reporting requirements; some personal information about students and families may not be shared across systems and reporting structures.

Q. How do school personnel beyond the team support the CSCP?

A. Whether or not a school uses the counseling staff/team approach, other school staff should support the program. The whole school contributes to the program through existing student support systems, such as with a multi-tiered system of support, social-emotional learning, and whole-child approaches. Supporting students toward the goal of wellness, inclusion, and belonging is a collective effort where everyone plays a role, and collaboration is critical. The CSCP is proactive, preventative, responsive, and integrated into schoolwide and classroom experience; the lead's plan may involve a needs assessment and, with teachers, a calendar of classroom lessons and small-group activities.

Q. Is every TSPC-licensed School Social Worker supposed to deliver a CSCP?

A. Districts and schools have flexibility to determine which professionals lead the CSCP, in accordance with state law and rules. Every School Social Worker can support and implement the program within the scope of their license, and those who have been professionally trained in CSCPs can lead the program. School counselors and school social workers have distinct training and expertise with some overlap in practice, where school counselors often focus more on supporting all students, social workers may focus on connecting families to community services. Per TSPC rule, a School Social Worker should not be hired into a School Counselor position. The lead role may be filled by either role, so long as each is hired into a position corresponding with their professional training in CSCPs.

School social workers are an important part of the team, whether based on site or not. There are times when a school social worker or social worker does not work at the school but provides services on occasion to the school. In those instances, the person cannot serve as the school's lead for the CSCP.

When there is neither a school counselor nor a school social worker at the school, the school administrator should determine another staff member in the building who is trained and can serve as the lead of the CSCP. A school social worker or social worker may be assigned with supporting the on-site lead at the school, and in those instances serve as part of the counseling staff/team approach.

ESD, District, and Administrator Roles

Q. How can district counseling coordinators support schools without school counselors or school social workers?

A. A district counseling coordinator, Counselor on Special Assignment (COSA), may coordinate, support, and provide professional learning for counseling staff. This will ensure that there is direction and momentum towards building and sustaining the CSCP, even through short gaps in staffing or training. In schools without school counselors or school social workers, or where there are newer counseling staff or those with limited training in CSCPs, the district counseling coordinator may temporarily provide onboarding of an identified lead and/or connecting CSCP leads across buildings for mentoring and support.

Q. Can a district or school pair with another school or ESD to provide a CSCP?

A. Yes. Leads from other schools can temporarily support newer counseling staff, or those with limited training in CSCPs. Districts may contract services through ESDs or other county or community agencies. The ESD or counseling staff from other buildings may mentor and help onboard. These counseling staff may serve on the multidisciplinary team, but cannot serve as the lead. The building administrator still determines the on-site TSPC-licensed and trained individual to lead the CSCP on a permanent basis.

Q. How can administrators support the CSCP at a systems level?

A. While everyone in the school helps support a strong CSCP, the administrator serves an especially important role. They ensure dedicated time for the lead and counseling staff/team to plan, evaluate student data, set program goals, plan and provide services and supports, and communicate program results. Administrators can work towards keeping counseling staff to student ratios at the 1:250 ratio recommendation, and allow counseling staff to focus on delivering direct and indirect services and supports for 80% of their time. They also help support counseling staff by ensuring systems are in place for culturally specific community and agency referrals for students and families to receive specialized support, interventions, or long-term counseling and treatment.

Q. What is the accountability for this rule?

A. CSCP is part of the Division 22 assurance process. Districts must report annually to their school board and to ODE. The district and school administrator overseeing CSCP counseling staff are responsible for compliance with ORS, OAR, and TSPC rules. OAR 581-022-2060, Section 4, allows ODE to review the CSCP as part of the program evaluation and improvement process to provide support and technical assistance to districts and schools.

District Hiring & Retention Practices

Q. How should a district post an open position to stay in compliance?

A. The job description and how the position is posted matters. Review your current counseling staff/team to determine what positions and professional skills are evident and what may be needed to fully implement the comprehensive program. A district should not advertise or hire a School Social Worker to fill a School Counselor position (except a temporary substitute under three months). A district can advertise for an open position based on the skills involved for the job (rather than license type), allowing them to hire a person whose qualification may be those of a school counselor, social worker, or other relevant credential. The district should name the position by a title or role that corresponds to the professional training and license of the employee and should not call it a school counselor unless the person hired is qualified and licensed as such.

Q. Where can we compare the coursework of various specialties?

A. TSPC provides a list of universities with approved preparation programs and the program standards candidates must complete. The district HR or hiring administrator can review applicants and counseling staff's transcripts to identify completed coursework, training, and professional programs.

Q. How does this guidance improve hiring practices?

A. The team approach ensures no staff work alone and pools the strengths and expertise of multiple professionals in their distinct roles, providing different perspectives, experiences, and training, while bringing a unique lens to supporting students and building a positive school culture. It also offers flexibility and options for small or rural districts to staff their counseling programs with the right counseling staff and positions for their own context where applicants with certain qualifications may be limited.

Q. Can a district further limit who it employs to deliver a CSCP?

A. Yes. A district may determine which staff and positions to hire, so long as there is at least one TSPC-licensed team member and the counseling staff/team as a whole has the minimum professional training and experience listed in the OAR.

Q. What are some retention strategies, especially for staff of color?

A. Build belonging and a sense of community; create a culture of care, honesty, trust, and communication; provide affinity groups; establish mentoring; offer hybrid and flexible options; build inclusive career and learning opportunities; and conduct empathy interviews, focus groups, and surveys to ask what is needed and wanted.

Implementation and Resources

Q. What does the CSCP look like day-to-day?

A. Oregon's Framework provides the required components. How the program is developed and implemented varies by school context, counseling staff, and student needs. There is flexibility in implementation, but the components are consistent across schools.

Q. What are some resources to help our district?

- Oregon's Framework for Comprehensive School Counseling Programs
- Counseling Program Personnel and Licensing Requirements
- CSCP District Guidance Q&A webinar recording and slide deck
- Staffing Responsibilities Matrix
- Role Clarity Conversation Protocol
- ODE's CSCP Course Modules
- Hatching Results templates: Roles of Student Services Personnel; Sample Menus of Services
- National guidance: A Framework for Safe and Successful Schools; Joint Teaming Statement