



Frequently Asked Questions

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

Overview

This document provides clarification to districts and schools about who can design, deliver and implement comprehensive school counseling programs, in accordance with [Oregon Revised Statute \(ORS\) 329.603](#), [Oregon Administrative Rule \(OAR\) 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.

This FAQ is organized into broad categories to help districts easily navigate to the information they need for determining counseling program personnel and hiring approaches and practices. Below is a list of commonly used acronyms used throughout the document.

Commonly Used Acronyms

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

Table of Contents

Key Roles in the Comprehensive School Counseling Program	4
How do I know if we are in compliance with the personnel requirements?	4
Who leads the design, delivery, and implementation of the comprehensive school counseling program?	6
What are the three approaches a district can take for the design, delivery and implementation of the Comprehensive School Counseling Program?	6
The Role of Leads for the Comprehensive School Counseling Program.....	7
What does the lead do that is different from other roles?	7
Can anyone with a TSPC license lead the CSCP?	7
Who will determine the licensed TSPC staff member to lead the CSCP?.....	7
Must the lead be on-site full time at the school?.....	7
Do they need to be licensed to be employed or can they be in a program working on it?	8
Team Approach to School Counseling	8
What defines the team approach? Who is part of the team and how do team members work together?.....	8
What considerations should I keep in mind if we use contracted specialists to provide some counseling services?	9
How do school personnel beyond the team support the comprehensive school counseling program? If a school has a School Counselor or School Social Worker, how can other staff support the CSCP?.....	9
Is every licensed TSPC School Social Worker supposed to be a part of delivering a CSCP? If not, when should they be doing so and when would their work be seen as separate?	9
ESD, District, and Administrator Roles	10
How can TOSAs/COSAs best provide support to schools without school counselors or school social workers?.....	10
Can a district or school pair up with another school or ESD to provide a comprehensive school counseling program? Would the ESD person be a licensed school counselor?	11
How can administrators support the school’s CSCP on a systems level?.....	11
What is the accountability for this rule?	11
District Hiring & Retention Practices	12
How can a district post an open position to fill it with the right candidate? What are hiring considerations I need to know to ensure our school is in compliance?.....	12
Is there a reference where we can see the coursework that the various specialties take in comparison to each other to help know what strengths each professional brings?	12
How does this guidance improve hiring practices?	12
Is there anything in the legislation that would prevent a school district from further limiting who they would like to employ to deliver a comprehensive school counseling program, if they choose to do so?	13

What are some retention strategies, especially for staff of color? 13

Implementation and Resources 13

What does the CSCP look like in practice day-to-day? 13

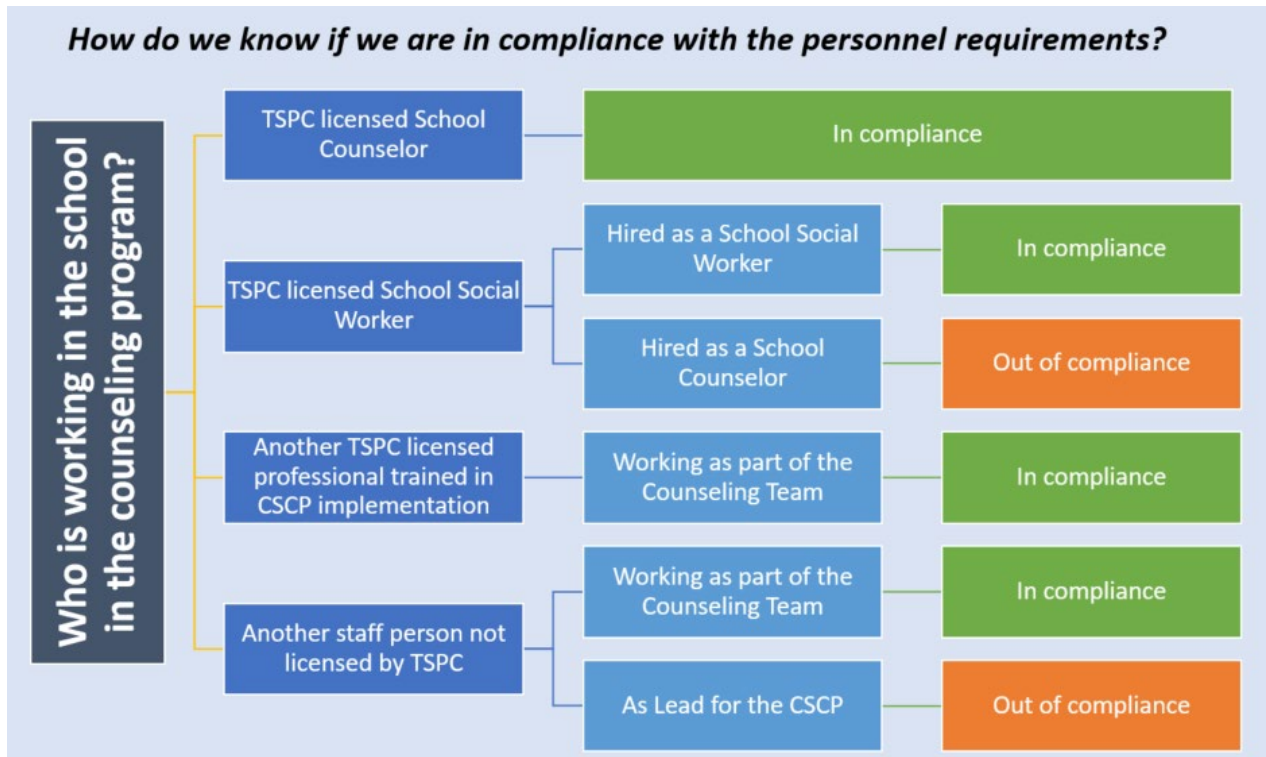
What are some resources to help our district? 13

More questions 14

Key Roles in the Comprehensive School Counseling Program

How do I know if we are in compliance with the personnel requirements for the Division 22 rule for school counseling programs?

Use the following flowchart to determine compliance:



Step 1: Identify who is working in the school building in the counseling program:

- TSPC licensed School Counselor
- TSPC licensed School Social Worker
- Another TSPC licensed staff person
- A staff person not licensed by TSPC

Step 2:

→ If a TSPC licensed **School Counselor** is working in the building, then the district is in compliance.

→ If a TSPC licensed **School Social Worker** is working in the building, the next step is to check what type of position they were hired to fill:

→ **If they were hired to fill a School Social Worker position**, then the district is in compliance. The district shall have a job description reflecting the School Social Worker role and [TSPC scope of license](#). The district can then determine the

strength areas and training of the person to lead the comprehensive school counseling program.

→ ***If they were hired to fill a School Counselor position***, then the district is out of compliance with the ORS, OAR, and [TSPC rule](#) which state that a person holding a School Social Worker license may not:

- *Substitute as a School Counselor for a period greater than three consecutive months without obtaining the School Counselor license;*
- *Accept any full or part-time position as a School Counselor; or*
- *Go by the title of School Counselor.*

For more details about the hiring process, see [Hiring Considerations](#) below.

→ ***If a Child Development Specialist, School Psychologist, QMHP, LCSW, LPC or other non-TSPC licensed staff member*** is working in the school building or contracted to work with a district or school, they may serve as part of the school's counseling team. **The building administrator still needs to identify one or more professionals who are licensed by TSPC to be part of the team, in order to be in compliance with OAR 581-022-2060. The team as a whole must demonstrate training and experience in leading the design, delivery and implementation of the comprehensive school counseling program in the building.** In some cases, the building administrator can serve as the TSPC licensed professional to lead the counseling program when they have been trained in how to design, deliver, and implement a school counseling program. In this case, the lead will rely on a team approach of multidisciplinary staff members to implement the counseling program.

→ ***If there are no TSPC licensed staff trained in CSCP*** in the school, identify if there is someone at your district and/or ESD to support the school's multidisciplinary team who is trained in how to design, deliver, and implement a CSCP.

Note: Even for schools that hire a TSPC licensed School Social Worker or School Counselor trained in how to design, deliver, and implement a CSCP, it is best practice and common for these leads to collaborate with other professionals in the school in support of the program's goals.

For more information on training available to support the team approach, visit [ODE's Comprehensive School Counseling webpage](#).

Who leads the design, delivery, and implementation of the comprehensive school counseling program?

A school has the option of selecting one of the following to lead the design, delivery, and implementation of their comprehensive school counseling program:

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

See the [Team Approach](#) or the [Role of Leads](#) sections for more information.

What are the three approaches a district can take for the design, delivery and implementation of the Comprehensive School Counseling Program?

ORS 329.603 identifies the key roles in the school's Comprehensive School Counseling Program, which must be designed, delivered, or otherwise implemented by:

- 1) *TSPC licensed School Counselor, or*
- 2) *TSPC licensed School Social Worker, or*
- 3) *Any combination of persons qualified to implement the program, as defined in OAR 581-022-2060.*

OAR 581-022-2060 further defines the combination of persons:

- 1) *A team consisting of staff who include one or more professionals licensed by TSPC, and*
- 2) *The team members as a whole have professional training or experience in the following areas:*
 - a) *Oregon's Framework for Comprehensive School Counseling Programs*
 - b) *Counseling methodologies*

- c) *Social and emotional learning*
- d) *Mental and behavioral health supports*
- e) *Trauma-sensitive practices*
- f) *Culturally responsive and sustaining practices*
- g) *Curriculum, instruction and assessment*
- h) *Career Development*

The Role of Leads for the Comprehensive School Counseling Program

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

The CSCP lead is a part of the school counseling team and is licensed by TSPC with the training in how to design, deliver, and implement a Comprehensive School Counseling Program. The lead helps coordinate the planning, implementation, and improvement of the CSCP with the counseling team and works with their supervisor to ensure that the program components, resources, and personnel are fully in place, supported, and in compliance with [OAR 581-022-2060](#).

Can anyone with a TSPC license lead the CSCP?

No. The lead is a school staff member who is licensed by TSPC and is part of the counseling team that has training in how to design, deliver, and implement Comprehensive School Counseling Programs.

Who will determine the licensed TSPC staff member to lead the CSCP?

The building administrator is responsible for working with the CSCP team to clearly define the scope and role of the team members and how they work together to implement the program. The administrator can help the team members identify the strengths and gaps in their training and support them in getting trained in the necessary functions to serve in their role on the multidisciplinary team. The administrator will help determine who else should be a part of the multidisciplinary team to bring the professional training and experience to fill any gaps. The building administrator can also help identify partners, including community and agency partners, who can provide mental health services and long-term counseling to students and their families and caregivers.

Must the lead be on-site full time at the school?

No. In some instances, a CSCP lead might work in two or more buildings as part of their position, and may serve as the lead for the CSCP at one or more schools.

Do they need to be licensed to be employed or can they be in a program working on it?

Staff who are working towards a degree or certification can play an important role in the multidisciplinary team approach, using their background and learning to serve students. However, they cannot serve as the lead unless they are TSPC licensed with an emergency or restricted license and have the training or experience to manage the school's CSCP.

Team Approach to School Counseling

What defines the team approach? Who is part of the team and how do team members work together?

The counseling team approach is used in both large and small districts when a multidisciplinary combination of individuals, each bringing their own unique expertise, training, and experience, work together to support the full implementation of the comprehensive school counseling program. At least one of these individuals is licensed by TSPC, while the combined team has the professional training or experience to implement the CSCP.

Team members may include child development specialists, state licensed counselors or social workers, mental health providers, and other professionals such as QMHP, LCSW, LPC, Career Counselors/Advisors, or classroom educators. Unless they are also licensed by TSPC and trained in how to design, deliver, and implement school counseling programs, these staff are members of the team, but cannot serve as the professional licensed by TSPC who is required to be part of the team.

Each person in the multidisciplinary team brings their background, training and expertise to their role in supporting the CSCP. Utilizing the strengths of each member on the team, all components of the school counseling program should be implemented. All team members collaborate, partner, and consult with each other to provide services and supports within the program components to meet the needs of all students and the school community. Each person works within the scope of their TSPC license or other certification and their school role. Some team members may have unique and overlapping areas of expertise that can strengthen the program services and supports provided. When needed, the building administrator works with the team to clearly define the scope and role of the team members, and how they work together to implement the program. The OAR expects that all school staff will participate in implementing aspects of the program.

See the [Resource section](#) to find templates and worksheets to organize and coordinate roles on the team.

What considerations should I keep in mind if we use contracted specialists to provide some counseling services?

Those hired by the district may have different FERPA/HIPAA requirements than those who are contracted to work with schools from the community or an agency. When schools/districts contract with an agency or community group to ensure adequate staffing for their CSCP, schools should be attentive to the different privacy and reporting requirements between school/district-hired staff and contracted staff employed by an external organization. Some personal/private information about students and their families may not be able to be shared across systems and reporting structures.

How do school personnel beyond the team support the comprehensive school counseling program? If a school has a School Counselor or School Social Worker, how can other staff support the CSCP?

Whether or not a school uses the team approach, other school personnel should support the CSCP. The entire school contributes to shaping the counseling program through the systems it already has in place, such as a multi-tiered system of support, social and emotional learning, and whole child approaches. Supporting students toward the goal of wellness and belonging is a collective effort where everyone has a role to play. Collaboration between CSCP staff and other school personnel is critical.

Comprehensive school counseling is proactive, preventative, responsive, and integrated into the school-wide and classroom experience. Part of the CSCP plan developed by the lead(s) may involve a needs assessment to proactively identify practices for different grade levels. In collaboration with teachers, the CSCP leads may develop a calendar for the year for classroom lessons and small group activities.

Is every licensed TSPC School Social Worker supposed to be a part of delivering a CSCP? If not, when should they be doing so and when would their work be seen as separate?

Schools and districts have flexibility to determine which professionals are tasked with leading the CSCP, in accordance with state law and rules. Every School Social Worker can be a part of supporting and delivering the CSCP.

Every team member will support the CSCP within the scope of their license. School counselors and school social workers have distinct training and expertise, though in practice in the school, there may be some overlap in the services they provide and roles they play. School counselors may focus more on supporting all students, whereas social workers may focus on supporting

families to access community services and support. School social workers have an important role to play in the school, in addition to the role they may fill as the lead for the CSCP.

It is important for schools to provide coordinated services. At schools employing both counselors and social workers, school counselors will have clear roles and responsibilities, while the school social workers will have other defined responsibilities and roles within the school community.

Per [TSPC rule](#), a School Social Worker should not be hired into a School Counselor position; this practice would lead the district to be out of compliance. What the requirement states is that the role of lead for the CSCP can be filled by either a School Social Worker or a School Counselor, so long as either is hired to a position corresponding with their professional role. This provides schools with flexibility in their hiring while ensuring the goals of the CSCP are fulfilled.

School social workers can be an important part of the team, whether based on site or not. There are times when a school social worker does not work at the school but provides services to the school. That 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 may be tasked with supporting the on-site lead at the school and may serve as part of the team approach.

See [District Hiring & Retention Practices](#) for more details.

ESD, District, and Administrator Roles

How can TOSAs/COSAs best provide support to schools without school counselors or school social workers?

There are some districts with a Teacher on Special Assignment (TOSA) or Counselor on Special Assignment (COSA) who are tasked with coordinating, supporting, and providing professional learning for comprehensive school counseling program personnel. If there are schools without a school counselor or school social worker, the TOSA/COSA may be tasked with temporarily supporting the onboarding of a person who has been identified to lead the school CSCP. This will ensure that there is direction and momentum towards building and sustaining the CSCP, even through short gaps in staffing. If there are newer personnel or personnel with limited

training in the CSCP, the TOSA/COSA may connect CSCP leads from different buildings to help mentor and support the personnel as they onboard and build their program.

Can a district or school pair up with another school or ESD to provide a comprehensive school counseling program? Would the ESD person be a licensed school counselor?

In some districts, there may be a need to receive support from a person trained in CSCP from their ESD or a lead from another school.

- Leads from other schools can serve on a temporary basis to support newer personnel or personnel with limited training in the CSCP.
- Districts may choose to contract some services through Education Service Districts or other county or community agencies. The ESD staff or other school personnel may serve as a resource to mentor and help onboard the newer person until they build their knowledge and training in CSCP. These staff may serve as part of the multidisciplinary implementation team but cannot serve as the lead.

The building administrator will still need to determine who is the TSPC licensed and trained individual on site to lead the CSCP on a permanent basis.

How can administrators support the school's CSCP on a systems level?

Everyone in the school helps support a strong CSCP. One way administrators can support the program is by dedicating time for the CSCP lead and multidisciplinary team members to plan for designing, delivering, and implementing the school's CSCP. Managing the CSCP requires time to evaluate student data, program goals, and outcomes, plan for mental health services, and communicate about the program results.

Administrators can also support CSCP leads and team members by ensuring systems are in place for culturally-specific community and agency referrals where students and families may receive specialized support, interventions, or long-term counseling and treatment.

What is the accountability for this rule?

CSCP is part of the Division 22 assurance process. Districts must report annually to their school board and to ODE. The building and district administrator who oversees the CSCP personnel is responsible for ensuring that the school is in compliance with the ORS, OAR, and TSPC rules.

OAR 581-022-2060, Section 4, allows ODE to conduct a review of 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

How can a district post an open position to fill it with the right candidate? What are hiring considerations I need to know to ensure our school is in compliance?

How the position is posted matters. A best practice is looking at your current school team to determine what positions and skills are needed to round out the team that is implementing the counseling program.

A district should not advertise and hire a School Social Worker to fill a School Counselor position, and should not place a School Social Worker in a School Counselor position, unless it is in a temporary substitute situation (for less than three months).

A district can advertise an open position based on the skills involved in the job (instead of license type), allowing them to hire a person whose qualifications may be those of a School Counselor, School Social Worker, or other relevant credentials. The district should name the position by an appropriate title or role that corresponds to the professional training and license of the employee; they should not call the position that of a School Counselor unless the person hired is qualified and licensed as such.

Is there a reference where we can see the coursework that the various specialties take in comparison to each other to help know what strengths each professional brings?

TSPC provides a list of universities with [approved preparation programs](#) with [program standards](#) that candidates in pre-service programs must complete and demonstrate.

How does this guidance improve hiring practices?

The team approach ensures no staff are working alone and pools the strengths and expertise of multiple professionals operating within their distinct roles. Each role offers different perspectives, experiences and training, and brings a unique lens to supporting students and building a positive school culture.

This guidance also offers flexibility and options for schools to staff their counseling program with the right personnel and positions for their own context.

See the [Key Roles](#) section for the full requirements for these positions and staffing structures.

Is there anything in the legislation that would prevent a school district from further limiting who they would like to employ to deliver a comprehensive school counseling program, if they choose to do so?

The ORS identifies the key roles in the school's Comprehensive School Counseling Program:

- 1) TSPC licensed School Counselor, or
- 2) TSPC licensed School Social Worker, or
- 3) Any combination of persons qualified to implement the program, as defined in OAR 581-022-2060.

A district can determine which staff and positions they wish to hire as part of their counseling team, so long as there is at least one TSPC licensed team member and the team as a whole has the minimum professional training and experience listed in the OAR.

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

There are many ways for schools and districts to create inclusion and supports to retain a diverse staff:

- Build belonging and a sense of community
- Create a culture of care, honesty, trust and communication
- Provide affinity groups
- Establish a mentoring program
- Provide hybrid and flexible workplace options
- Build inclusive career opportunities (learning and training)
- Conduct empathy interviews, focus groups, surveys – Ask what is needed and wanted.

Implementation and Resources

What does the CSCP look like in practice day-to-day?

[Oregon's Framework for Comprehensive School Counseling Programs](#) provides the required components for a program. How the program is developed and what the implementation looks like in schools day-to-day will vary based on school context, counseling personnel and student needs. There is flexibility in the way the program is implemented, but the components of the program are consistent across schools.

What are some resources to help our district?

ODE's Comprehensive School Counseling Webpage

- [Oregon's Framework for Comprehensive School Counseling Programs](#)
- [Counseling Program Personnel and Licensing Requirements](#)
- CSCP District Guidance Q&A Session - [Webinar Recording](#), [Sliddeck](#)
- CSCP Course - *Coming soon!*

Hatching Results Templates

- [Roles of Student Services Personnel](#)
- [Sample Menus of Services](#)

National Supporting Guidance

- [A Framework for Safe and Successful Schools](#)
- [Joint Teaming Statement](#)

More questions

If you have a question that isn't covered in this FAQ document, please let us know at: beth.wigham@ode.oregon.gov.