

A Phenomenological Investigation of the Nexus between New York State Education Department's School Counseling Policy and Practice in New York State

Carol Dahir

New York Institute of Technology

Robert Feirsen

Manhattanville University

Cameka Hazel

New York Institute of Technology

The intent of educational policy is to improve student outcomes. This study illustrates the challenges and opportunities experienced by school counselors and school leaders as they implement the amended New York State School Counseling Regulations effective 2019. The qualitative study further explores the differing perspectives voiced by counselors and school leaders concerning their ability to fulfill the policy mandates and reveals the implementation process at the building level. Focus group questions used in the investigation were based on a previous mixed-methods study and identified themes including role confusion, administrative expectations, contributions to the school environment, and essential resources. Research findings may be applicable across many locations and suggest that communication and leadership are essential for implementing policy changes with fidelity to develop shared understandings of regulatory intentions, diminish role confusion, and increase equitable access to school counseling programs, ultimately resulting in greater student success.

Keywords: school counseling, state policy, counselor role, state departments of education

Introduction

Policies and regulations at the state level are major factors affecting school counseling practice (Martin, et al., 2015); unlike other countries, the federal government in the United States exerts little influence (Martin et al., 2015; Popov & Spasenovic, 2020).

Gaps continue to persist between the ideal conceptualization of the school counselor role as represented by the American School Counselor Association (ASCA) and practice as reported from the field (Shimoni & Greenberger, 2018). Differences in views of school counselor roles between counselors and school leaders may reflect their professional responsibilities, with counselors focusing on child development and school leaders taking a holistic view of organizational structures and processes (Yavuz et al., 2017). Efforts at reducing "role ambiguity" (i.e., differences in role expectations between counselors, school administrators, and stakeholders)

target changing the perceptions of school leaders and convincing them of the value of supporting the adoption of comprehensive models of practice, such as the *ASCA National Model: A Framework for School Counseling* (2019) that require a broad counselor role (Morshed & Carey, 2020).

Many U.S. state departments of education seek to align school counseling with the ASCA National Model (2003, 2005, 2012, 2019); for example, recent mandates in New York (2017), Arkansas (2019), Delaware (2019), Connecticut (2020), Georgia (2022), and West Virginia (2024) have changed the landscape of practice and require the delivery of a comprehensive program. Nevertheless, there is considerable variation from state to state (Savitz-Romer et al., 2024). Some state departments of education also are proposing substantive changes in the delivery of school counselor programs and services, which may enlarge (New Jersey, 2024) or constrict the scope of practice (Florida, 2024; Indiana, 2023; Texas, 2024) by pruning “extraneous” components of the school counselor’s role (Fan et al., 2019).

Since the last regulatory updates in 1978, the New York State Education Department (NYSED) relied on school counselor goodwill and local district oversight to provide services and supports as loosely outlined in Commissioner’s Regulation, Part 100.2. In 2013, NYSED senior administrators proposed a revision in the scope of practice of school counselors and school counseling programs. New York State was moving into the 21st century!

The revision process included three years of exploration and research and engaged hundreds of state and national leaders as well as the New York State School Counselor Association (NYSSCA). This was followed by two additional years of committee work and legal department oversight, resulting in the approval of these amended regulations effective July 1, 2019, requiring the implementation of a comprehensive standards-based school counseling program in every school building across NYS. “The purpose of these [school counseling] services is to help students access their education by removing barriers to learning” (NYSED, 2018, p 11). This was the first major overhaul of the school counseling role, scope of practice, and educational requirements in New York State in more than 40 years.

A related mixed-methods study (Cinotti, 2022) revealed themes including role confusion, administrative expectations, contributions to the school environment, and essential resources. These themes formed the foundation for this qualitative analysis of the lived experiences of school counselors and school leaders and the discussion of what is needed to implement policy at the school and district level.

Review of Literature

Previous research continues to inform studies of the school counselor role (Fan et al., 2019), commitment to leadership and advocacy (ASCA, 2023), contributions to student and school success (Fallon et al., 2023), policy mandates, and resources needed to support students (Mullen et al., 2021). These ongoing concerns persist and influence the scope of practice of contemporary school counselors which is the basis for this qualitative investigation.

Role Confusion and Ambiguity

For years, the profession has called for a shift in school counselor role from service provider to one of promoting optimal achievement for all students (Dahir & Stone, 2007; Dahir et al., 2015;

Tang & Erford, 2010). School counselors have gained more respect when they are seen as essential to student well-being and achievement (Lauterbach et al., 2018; Mau et al., 2016).

“School counselors’ efforts to promote awareness and support for their professional role” (Cigrand et al., 2015, p.10) are essential if their scope of practice is to be readily understood and accepted. When school counselors experience role confusion, they may not be able to practice as they would choose to do (Olsen et al., 2023), as they were trained (Cinotti & Springer, 2016), or as now they are expected to do.

Advocacy

A clear professional identity in school counseling is the foundation for professional advocacy (Cinotti, 2014; Gibson et al., 2012; Havlik et al., 2018). School counselor advocacy includes supporting students on an as-needed basis; ensuring that every student benefits from a program that emphasizes academic, career and college, and social-emotional developmental growth and learning; and, assuring that school district policies and practices fairly and equitably provide educational opportunity to every student. School counselors use of advocacy is aligned with the social justice movement (McMahon et al., 2009) and with the need to engage in anti-racist school counseling practices (Beasley & Ieva, 2022). Prior to NYSED’s implementation of the amended school counseling regulations in 2019 and continuing to this day, advocacy for equity and the importance for the contemporary role of the school counselor continues to be an ongoing challenge.

Leadership

School counselors are key contributors to improving the conditions under which students learn (ASCA, 2019; Stone, 2022). Serving in a leadership role allows the school counselor to participate fully as an integral part of the mission and vision of the school by supporting each student’s success. Leadership is a powerful way to influence both the internal school community and the larger external community. These collaborations can break down institutional and environmental barriers to create the conditions that help students realize the potential of their lives (Merlin-Knoblich & Chen, 2018; Mullen et al., 2019).

While school counselor leadership differs from school building leadership, equity is a common bond. Leadership is essential to build a school culture that guarantees equitable positive outcomes for all students (Achievement Network, 2018). School counselors have the ability to utilize leadership skills to initiate these important conversations with their administrators and discuss areas that remain a challenge as new regulatory expectations are implemented.

Policy Mandate Impressions

School leaders serve as intermediaries in the process of moving policy from the statehouse to the schoolhouse: they have great power to shape the way in which school staff understand, interpret, and act upon mandates (Bayeni & Bhengu, 2018; Stosich, 2017). In their leadership roles, they determine how to manage mandates that compete for time and resources (Watkins et al., 2021). Clarity about policy is essential for both school leaders and school counselors; their understanding of the pivotal role school counseling programs play in improving student outcomes is paramount (Rutledge et al., 2023).

Prior studies revealed principals and other school leaders had little to no exposure to the ASCA National Model or training in how to help counselors implement the model (Bardhoshi & Duncan, 2009; Fitch et al., 2001; Kirchner & Setchfield, 2005, Lowery et al., 2018). Thus, there remains a lack of research identifying the applications of policy and the expectations of educational leaders and school counselors.

Impact on Students

Using data-driven practice helps school counselors inform school counseling programs as well as understand which groups of students are not effectively served in their school system (Chandler et al., 2018). The relationship between school counselors and building leaders points to the need for improved understanding and mutual collaboration (Lowery et al., 2018; Yavuz et al., 2017) to foster positive school change and achieve more successful academic outcomes for students.

Research shows that improvement in both social-emotional learning and cognitive-learning outcomes is possible when school counselors deliver direct counseling services within the classroom or small-group setting (Lemberger et al., 2018). When school counselors support more college readiness efforts, data show that students benefit beyond high school (Jones et al., 2019). Regulatory revisions in many states may include specific goals, yet there is a lack of research to address and analyze their impact on school counselors, students, and schools.

Essential Resources and Supports

What resources and supports are essential to serve students as required by expanded expectations? Administrators provide teachers with an appropriate schedule, necessary materials, and access to students. School counselors need the same.

Schools in historically marginalized areas with limited resources often assign school counselors tasks (e.g., bus duty, substitute teaching, test administration) that are not aligned with recommended best practices by ASCA (Geesa et al., 2022). According to Fye et al. (2018), the amount of time spent on non-counseling duties, perceived principal support, and principal understanding of appropriate school counselor roles were statistically significant predictor variables for school counselors' ability to implement the ASCA National Model.

Purpose of the Study

This phenomenological study analyzes the lived experiences of school counselors and school leaders in New York State as they implement amended regulations that require the delivery of a comprehensive school counseling program. The study explores their perspectives concerning the mandated changes and examines how new policy regulations are implemented at the school level.

Two research questions guided this study: (a) what are the lived experiences of the school counselors and school leaders in implementing the NYSED amended updated policy? (b) what are the challenges and the opportunities expressed by study participants to fulfill the regulatory requirements?

Systems Theory Framework

The study recognizes the inherent challenge of implementing policy with fidelity in educational settings (Viennet & Pont, 2017). Systems theory is fitting as the framework for this study as it reflects the understanding of the interrelatedness of various parts of a system and the reliance of all these varying parts to work together to achieve a common goal (Post, 2022). Systems theory has been used in varying contexts including management, psychology, and decision-making models (Post, 2022). Research suggests that a systems approach to school improvement increases the likelihood of policy reform success and positive student outcomes, while an incoherent or isolated approach can hinder improvement (Norqvist & Ärlestig, 2021; Sanders, 2014).

A principle of systems theory is that an institution's success depends on the synchronization of all its components. In this study, systems theory provides a foundation for understanding relationships between policy development at the state education department (NYSED) and implementation at the school level, where beliefs and actions by school leaders, school counselors could support or hinder the statewide school counseling improvement efforts. Utilizing a systems approach can lead to a more nuanced understanding of the role of state policy in shaping school improvement initiatives, in this case, changes to school counseling, and achieving higher levels of impact across component school districts (Cohen, et al., 2020; Viennet & Pont, 2017).

Methodology

The study uses a descriptive phenomenology approach. Descriptive phenomenology seeks to provide accounts of subjects' lived experiences, that is, "what it is like for a person or a group of people to experience a particular phenomenon" (Matua & Wahl, 2015, p. 26). The methodology traces its origins to the philosophical movement of phenomenology, which focuses attention on the way humans understand their experience from a first-person perspective (Husserl, 2001; Smith, 2018).

Focusing on the subject's interpretation of experience in-the-moment provides insight into how people are constructing the meaning of their environment and their interactions with others. "At its root, the intent is to understand the phenomena in their own terms—to provide a description of human experience as it is experienced by the person herself" (Bentz & Shapiro, 1998, p. 96). A phenomenological approach is appropriate for the study as it allows school counselors and school leaders to articulate their own understandings of the experience of implementing new policy directives. The comments of participants, in turn, provide data for analysis and the identification of patterns.

Participants

The researchers used a purposeful sampling strategy to recruit study participants. Four hundred thirty-five individuals who participated in a previous mixed-method survey (Cinotti et al., 2022) were invited to participate in focus groups to further explore their responses. Forty participants indicated their interest in participating in a Zoom focus group interview, and twenty-three followed through.

The researchers created three focus groups; participants were asked to select one of three dates to participate in the study, and the groups were created and organized based on their availability. Group one consisted of eight participants; group two had six participants; and group three had nine participants. Focus group participants identified as assistant principals, directors of

school counseling, and school counselors employed in public and private schools in the State of New York. Participants' information is provided below in Table 1.

Table 1
Participants' Information

School Level	School Position	Number of Participants
Elementary	School Counselor	4
Middle School	School Counselor	3
Elementary + Middle	Director of Guidance	1
High School	School Counselor	12
District	Director of Guidance	1
Administrator	Assistant Principal	2
Total		(<i>N</i> = 23)

Data Collection

Data were collected through these three focus groups, which are well established components of qualitative research methods to provide insights into participants' perceptions and personal experiences with a particular phenomenon (Amir et al., 2024; Love & Davis, 2020) and allow for multiple voices in the same space. They are advantageous in phenomenological study because group conversations often generate more in-depth personal reflections on experiences than individual interviews (Palmer et al., 2010).

Themes that emerged from a previous study (Cinotti et al., 2022) served as the basis for the semi-structured focus groups with four key questions: 1) How do you perceive that the amended regulations affect the role and scope of practice of school counselors and the school counseling program? 2) How do the amended regulations contribute to the overall well-being of the school environment (academic and social-emotional development, college and career readiness, culture, climate, etc.)? 3) How have the amended regulations impacted the expectations of both school counselors and building leaders? 4) What resources have you identified to support your school counseling program?

Each researcher led one of the three focus groups, with each session lasting approximately 60 minutes. Participants granted permission to record the sessions through Zoom and removed identifiers including their personal and institution names. The researchers used Zoom recording to transcribe the focus groups and double checked the transcriptions for accuracy.

Researchers' Positionality

The research team consisted of two female faculty members in counselor education and one male faculty member in educational leadership. Two of the investigators have experience as school counselors in public schools: one in the United States, and one internationally. One author has extensive experience in educational leadership in both P-12 education and higher education. Two authors have conducted research concerning related topics for more than a decade.

The researchers recognized difficulties in fully controlling biases due to personal backgrounds, education training, and work experiences. Consistent with the descriptive phenomenology process, the researchers continuously engaged in self-reflection, followed by group dialogue to identify and examine personal biases to ensure that positionality did not influence the research process. The researchers analyzed the data individually in the initial process, then determined codes and themes together to reduce bias. They regularly consulted with each other to address concerns and challenges.

Data Analysis

The researchers conducted thematic analysis by using the phenomenological reduction process developed by Moustakas (1994). Thematic analysis is considered effective in qualitative research as it enables a systemic approach to derive and code themes from the qualitative data (Creswell & Báez, 2020).

To begin the phenomenological method of analysis, the researchers first examined their own personal experiences and shared their perspectives of the amended school counseling regulations to guard against imposing their own interpretations of subjects' statements. This process is called *epoche* and allows researchers to transcend any personal judgements regarding the phenomenon being studied (Moustakas, 1994).

Second, the researchers horizontalized the data, treating each statement as equally important; the researchers independently and then collectively read through the transcribed data to become familiar with participants' comments. Third, the researchers engaged in identifying meaning units, which include finding phrases and sentences conveying meaningful parts of participants' experiences. These meaning units were then transformed into more succinct and descriptive statements that captured the essence of participants' experiences. These descriptive statements were transferred to a spreadsheet to facilitate thematic analysis. Next, the researchers looked for patterns and recurring themes to generate and cluster similar meaning units together for a broader understanding of the participants' experiences. Finally, the researchers synthesized these themes into a more comprehensive description of the phenomenon, highlighting the significant meaning and structures derived from the data. The results were then shared with participants to confirm accuracy of interpretation (Creswell & Báez, 2020). Participants agreed with identified themes.

Trustworthiness

Credibility and confirmability are two ways qualitative researchers account for the trustworthiness of the data findings. Credibility is defined as the demonstration of the connection between participants' responses and the data findings. Confirmability is defined as the extent through which researchers ensure true representation of participants' experiences and not their own biases or preconceived notions in the data interpretation (Creswell & Báez, 2020). The spreadsheet served as an audit trail and allowed the researchers to reach consensus when they initially presented differing individual interpretations of the data.

The researchers conducted *member checking* (Creswell & Báez, 2020). Focus group participants received an email and were given the opportunity to read the identified themes and interpretation of findings to confirm the authenticity of the findings and to reduce biases (Sheperis et al., 2017). As the participants agreed that the thematic findings satisfactorily captured their

experiences with the implementation of the amended regulations, member checking served as a form of confirmability.

In summary, this study examines the lived experiences of school counselors and school leaders as they seek to implement the amended policies adapted by New York State for implementation beginning in 2019. The researchers used the methodology of descriptive phenomenology to gather and analyze participants' perspectives. Two research questions guided the study: (a) what are the lived experiences of the school counselors and school leaders in implementing the NYSED amended updated policy? (b) what are the challenges and the opportunities expressed by study participants to fulfill the regulatory requirements?

Findings

The study was guided by two research questions. The first question asked, what are the lived experiences of the school counselors and school leaders in implementing the NYSED amended updated policy? The second question asked, what are the challenges and the opportunities expressed by study participants to fulfill the regulatory requirements?

The study's findings are organized below in six themes that reflect participants' experiences and challenges: role confusion and ambiguity, advocacy, leadership, essential resources and supports, impact on students, and policy mandate impressions. Two of the themes, "role confusion and ambiguity" and "policy mandate impressions," illuminate RQ1, as they describe how participants' work practices at the school level were affected by the amended regulations. The remaining four themes, "*advocacy*," "*leadership*," "*essential resources and supports*," and "*impact on students*" connect to RQ2, as they relate the lived experiences of focus group participants with broader systemic issues that reflect or require organizational responses.

Role confusion and ambiguity

The role of the school counselor is one that has been steeped in ambiguity since the inception of the profession in the early 1900's (Dahir, 2025). Several participants shared their hopes that the amended regulations would bring more clarity.

One high school counselor commented, "The regulations made the social workers nervous because they worried that school counselors would take their place. But the roles are not the same; they work in conjunction. So, the mandate was valuable in stimulating dialogue about these roles." Another high school counselor reflected, "The regulations prevented school counselors from having added duties---[they] defined roles. Counselors otherwise could have cafeteria duty or proctoring."

A district director stated, "So with these new regulations, we've tried to make a shift and really have them [school counselors] focusing more on tier one interventions. But we're getting a lot of pushbacks from the department, especially those that have been here a long time, wanting to keep their role as is."

A high school counselor expressed concerns regarding overlapping responsibilities. The counselor remarked, "Social workers do the classroom work." A different counselor noted, "The regulations increased caseloads. A director concerned about persistent role confusion commented, "But I don't know if there's a way to create more guidance from a higher level between what would be an appropriate role for a school counselor versus a social worker versus a school psychologist." A second district director offered, "I think it has helped to justify and clarify a little bit, the role.

But again, the school counselors that have been here for a long time, they are veterans, and that are used to the role being a certain way, and they're really struggling with making that shift.

Overall, participants revealed that the new regulations did not provide sufficient clarity about the role of a school counselor. Some felt the mandate helped to clarify their role, while others were left confused.

Policy Mandate Impressions

Participants considered the impact of the new state mandates on their districts, schools, and themselves. A middle school assistant principal observed that the data collected because of the new regulations “had more impact than we ever could say. The data that we got back from the survey within our own population, not just our kids, but our parent community, was invaluable to guiding where we've gone.”

In a similar vein, a high school counselor contributed, “The regulations have been empowering because I'm able to say especially to my principal, “Look, this is something that should be delivered to students and I believe strongly that we need to be able to be given the time and resources to work with.” Participants also noted the mandate’s positive impact on staffing, “I think the regs have helped because we were finally able to hire elementary school counselors.” Another counselor added that their school’s new school “counseling/guidance plan” included the innovation of including teachers in helping to address student needs.

Several comments cited the value of new initiatives while also recognizing that changes in practice added pressure to the counselors’ jobs. For example, one counselor stated, “And so, I do think it's partially self-inflicted. But I think it's us having higher expectations for how we want our program to run.” A high school counselor similarly observed, “I do think we as counselors now we’re putting almost more pressure on ourselves. I definitely agree with that because, again, nothing has come off our plate. And now we have written regulations about what definitely should be and what that might look like.”

Counselors criticized the regulations for their failure to place limits on caseloads. Viewing the overall program impact, a high school counselor concluded, “[We] Can't provide holistic services anymore, as students get funneled to social workers for crisis. We don't know everything that goes on with the students anymore.

In essence, participants shared mixed impressions of the mandate. Some school counselors were able to use the regulations to their advantage, while others experienced them as added stress to their workload.

Advocacy

Advocacy for the school counseling program is predicated on school counselor initiative. The participants expressed different perspectives on how they “advocate” for their program. A high school counselor shared, “I educate admins and the school board. I never have a counseling advisory that my school board member and people in decision-making power can't make. A second high counselor shared, “It has been empowering to point to the regulation and say [what] we should be doing.” A different high school counselor observed, “Advocacy [is] very important. Make sure everyone knows and understands, include them in the meetings.” Another high school counselor shared, “In my district the only reason they have the knowledge of the change of regs is because

of me. I've informed the superintendent and assistants of the changes, and these should be talked about at that level and brought down to our level.”

An elementary school counselor made the important point, “We need to continue getting info to admin for them to see it is not just a nice thing but a mandate.” Another participant reported that the new regulations were “empowering” because they were able to use the stipulations to explain to their principals why they needed additional time and resources to deliver certain programs for students.

In summary, all participants agreed that advocacy played an important role in helping school leaders understand the new regulations. Focus group participants used advocacy as a means of providing information regarding the New York State mandate to those in leadership.

Leadership

Participants’ comments about school leadership’s roles and impact reflected a continuum of perspectives. A high school counselor noted, “Our administrators are supportive. We’ve always had an advisory [council].” Others expressed appreciation for the administration’s interest in enhancing supervisory and clerical support for school counselors. As one counselor stated, “We finally have a true director of counseling and mental health services, who is a school counselor, [and] has that background.”

In contrast, most participant comments presented direct or implicit criticism of administrator actions (or inaction) in connection with the state’s school counseling mandate. For example, one focus group member remarked, “I don't even know if my administrators are really aware of the new regs.” A middle school counselor noted that the administration was unaware of the mandate, with the result that the school was “behind in implementation, with no advisory council [as required by the regulations] and no director to advocate for the program.” Another high school counselor emphasized the need for buy-in from school leaders in order to acquire resources. A different high school counselor stated, “The administration does not seem to care.” Another offered, “How school counselors are used depends on the administration. Everything can flow downhill to the counseling office.”

School counselors described how they exercised leadership. A middle school counselor concluded, “We are now more focused and come together to put plans together.” A high school counselor explained, “I do think one of the positives is leading the advisory council (mandated). We pick one thing to focus on with our advisory council because it is overwhelming and get good feedback from the advisory council, even though it takes a lot of time to do it. Another counselor revealed, “[There has been] lots of administrator turnover, so the school counselors used the stipulation for the mandate to create their own unique plan.

In this theme, participants described varying levels of receptivity to the new regulations by their school leaders. When school counselors had the support of leadership, implementation of the regulations occurred more smoothly. The significance of leadership support was profound.

Essential Resources and Supports

The majority of the school counselor participants agreed that they did not have adequate resources to meet the new state school counseling regulations while some stated they received the necessary resources to improve their programs and address student needs. Participants highlighted inadequate clerical staffing and high counselor-to-student ratios.

Participants shared that the increase in post COVID-19 mental health issues, the lack of clerical support, and lack of leadership and qualified supervisors of school counseling programs hindered the fulfillment of the regulations. A high school counselor shared, “So, I think reasonable caseloads, enough clerical support, and having good leadership would help tremendously... having a director of school counseling services especially given the mental health needs would all be helpful [for regulation implementation].” A middle school counselor stated, “I think, in my district we're kind of behind the times. We still don't have any elementary school counselors and no advisory. So, we don't really have a director of counseling who would kind of push this [mandate].”

A few shared that resources were added including school counselors, a director of guidance and mental health, support staff, and special education teachers who deliver social and emotional learning curricula. An assistant principal noted, “We added a secretarial position to support school counselors,” and “the new state regulations were helpful in hiring support staff for the school counselors and prevented them from having added duties.”

From participants' accounts, access to resources and support drove the progress of implementation of the new regulations. Some school counselors stated that the regulations provided opportunities to acquire resources, while others noted a lack of resources available for mandate implementation.

Impact on Students

This theme highlighted how the amended regulations ensured that students have equitable access to programs and services. Some counselors expressed their gratitude for the regulations because more school counselors were then hired to address the social and emotional needs of elementary students. An elementary school counselor stated, “Our students in K-5 get programming now at least 10 to 12 weeks of counseling [activities].” Another school counselor saw the mandate's impact as a mixed blessing, with the hiring of an elementary counselor even though one counselor was hired for all three buildings.

School counselors appreciated the intentionality of collaborative opportunities between teachers and school counselors to develop and strengthen the now required school counseling curriculum. An elementary school counselor observed, “[The] curriculum maps include school counseling activities.” The maps could be used as a guide to deliver the lessons based upon goals and objectives for students.

The majority of participants' remarks indicated that the new regulations had a positive impact including increasing additional social-emotional support for students and higher levels of collaboration with teachers.

Overall, findings provide evidence of disconnects between the goals presented in the amended New York State regulations and the experiences of school counselors and school leaders at the school level (RQ1). Focus group participants cited varying understandings of the regulations and their impact on practice. Some participants also stated that the amended regulations provided valuable insights, while others saw opportunities for new initiatives. The majority expressed concern about obstacles to fulfilling the requirements of implementing the regulations and their roles (RQ2).

Limitations

Several limitations arising from the study should be noted. The sample used in the study involved respondents from only one state. As such, results may not be generalizable to other states in the US, school counselors who work abroad, or in other nations that have school counselors in practice. Participants also varied in terms of school levels and positions; the majority of participants represented high schools, while only four represented school leadership. In addition, several limitations are associated with focus group research including semantic ambiguity, reticence of focus group participants to offer comments contrary to what is perceived as “agreed upon information,” and time pressures that may constrain the full explanation of ideas (Acocella, 2012). Participant responses may have also been affected by facilitator dispositions, style, and skill (Shaha et al., 2011). In this study, each researcher served as facilitator for one of the sessions.

Discussion

Responses from this sample of school counselors and school leaders provided evidence that full implementation of the amended regulations for school counseling practice remains in varying stages of development. NYSED expected initiation to begin during the 2019-20 school year across New York State and during the 2020-21 school year in New York City. Participants’ comments revealed differing understandings of desired policy outcomes, unrealistic expectations, and frustration with the limited resources and the varying degree of administrative support provided.

Participants also shared concerns regarding the residual effects of the pandemic that continue to impact students’ mental health and divert attention from the amended regulations’ broader, long-term goals. Discussion of role and role ambiguity took center stage as well: respondents described concerns about potential overlap with—or replacement by—school social workers and the responsibilities assigned to each role.

School counselors believed that their advocacy helped other stakeholders become aware of the amended regulations and this was the primary reason school leaders and boards of education knew about the changes initiated by NYSED. Some school counselors took the initiative to inform administrators and boards of education about their work and the state mandate for school counseling programs. One remarked that they used their role in communicating this information as leverage in their efforts to secure resources and deliver programming. However, not all participants assumed a leadership role, which contributed to a lack of awareness on the part of some school leaders.

Many participants placed strong emphasis on the technical aspects of mandate implementation. Respondents cited increased paperwork, caseload concerns, and personnel increases or decreases in their responses to questions about the impact of the regulations. While considerable discussion and involvement of stakeholders preceded amended regulation design and adoption, implementation at the district and school levels occurs with minimal oversight from the State Education Department.

Although focus group participants cited a collaborative role for teachers in the school counseling curriculum design and delivery, some respondents concluded that the amended regulations had either a negative or little impact. While the regulations themselves require an annual program outcome report (NYSED, 2018), a participant characterized this as only a formality, stating, “No one from NYSED is reviewing district and building plans, or asking for annual updates or outcomes.”

Overall, the statements of focus group participants reveal the complexity involved in implementing statewide school counseling policy. Participants’ comments demonstrate that

implementation at the school level is not linear; variations occurred from site-to-site and acknowledge that social and human phenomena are complex and interconnected. Contributions from each focus group member, whether a school counselor or school leader, reflected their lived school based experiences, rather than a uniform set of circumstances.

Recommendations

What efforts are necessary to move policy into practice in a meaningful way? Attention first should be directed toward the NYSED, the originator of the revised policy. Absence of statewide oversight was a common theme from focus group participants. Infrequent communication to administrators from NYSED may have contributed to a lack of understanding and commitment on the part of school leadership. As a result, communication regarding the legislated changes to school administrators rested heavily on the shoulders of the school counselors (Feirsen, 2021; Geesa et al., 2022).

One focus group member described how school counselors developed their own implementation plans with the understanding that supervision and meaningful regulatory oversight would not be forthcoming by NYSED; others concluded that accountability for mandate implementation was minimal. Had schools been subject to implementation audits, greater alignment with expected practices might have emerged. While auditing every school would require an inordinate commitment of resources, the specter of a full state audit with consequences for noncompliance would render it more likely that schools and school districts would recognize that they are accountable for designing and operationalizing the various components of the expectations of the policy changes.

Dedicating a portion of the NYSED website would increase the visibility of the amended regulations. As a complementary and essential additional step, NYSED should continue its work with the New York State School Counselor Association (NYSSCA) as well as the regional Board of Cooperative Educational Services (BOCES) to present a series of professional development experiences. These sessions should focus on the amended regulations and the practices of comprehensive school counseling and should require attendance by building teams that include school leaders and school counselors. All participants would then receive consistent messages from well-informed sources regarding the specific provisions of the regulations.

Sessions would support school teams as they construct comprehensive programs focused on identified student outcomes and school improvement goals. The results could promote higher levels of uniformity throughout the state as well as a sustained focus at the school level, where the intermediary role of the building leader is key to achieving school change (Stosich, 2017). BOCES professional development sessions would also foster collaborative relationships between school counselors and school administrators, an essential ingredient for program success (College Board, 2021). Shared professional development experiences would similarly cement ties that build social capital (Cinotti, et al., 2022) which, in turn, would enable them to align school improvement visions (Odegard-Koester & Watkins, 2016; Rock et al., 2017) that address the goal of providing equitable educational opportunities for all students.

School counselors constituted the overwhelming majority of participants in the focus groups, and they often cited a lack of school leader interest or knowledge about the amended state regulations. Comments about school leadership—or the lack of it—may have great importance, as research suggests that administrators play a pivotal role in the success of school improvement

efforts (Donaldson et al., 2021; Grissom et al., 2021; Parker et al., 2022), including the successful implementation of comprehensive school counseling programs (Kruczek et al., 2022).

Absent school leader understanding of—and/or interest in—policy details and their own accountability for results, implementation may deviate significantly from policy design (Cohen et al., 2020). Relationships with school leaders have a significant influence on counselors' roles and positioning in schools, and therefore on their effectiveness in international settings as well (Harrison et al., 2023).

Research suggests these deviations can increase or decrease the likelihood that a given policy will achieve its desired outcomes, as principals take systematic “strategic policy actions” (Cohen et al., 2020, p. 138) that either advance or constrain their schools' capacity for change. As an example, the perceived lack of principal engagement may have encouraged some school counselors to focus on paperwork and such other forms of technical compliance with the regulations as the annual Individual Progress Review, thereby diverting attention from the equity-oriented broad goal of ensuring that every student receives the benefits of a comprehensive school counseling program. Similarly, administrators' lack of understanding or interest may have also resulted in the assignment of quasi-administrative or clerical duties that limit the availability of counselors for direct services to students (Dahir et al., 2019). Conversations about role ambiguity, school counselor-student ratio, and workload have been hot topics in the profession for decades (McGowan, 2021).

School counselors employed in international settings such as embassy and U.S. schools face similar concerns identified in this study's findings (Dose et al., 2022; Kakar & Oberoi, 2016; Langston & Van Gordon, 2024). These difficulties include concerns related to broader systemic issues that reflect or require organizational responses, including school counselor-principal collaboration. In summary, the lack of specific job descriptions, ambiguous role expectations, and policy impact were reported as challenges in both the New York and international settings (Langston & Van Gordon, 2024).

Additional connections between policy and practice have been experienced by DoDEA school counselors, who work at a multitude of international settings, and must now address the effects of recent Executive Orders (EO) which hinder their ability to serve students ethically and raise legal compliance questions.

The conflict between a personal values and mandated policies are a common concern that school counselors experience (Thomas & Dey, 2020). Countries including the Philippines (Hocson, et al., 2024; Karaman, 2025), Jamaica (Morris, 2024), and Turkey (Yavuz, et al., 2017) all have policies governing school counseling credentialing as well as the scope of practice, and counselors there face similar situations to those cited above.

Additionally, it is important for school counselors themselves, as the professionals most closely affected by the amended policy, to take a strong, intentional stance to advocate for the adoption of the comprehensive school counseling program articulated in the amended regulations. Advocacy would help ensure that implementation with fidelity remains a priority and equitable access to comprehensive school counseling programs is accepted as a core belief.

Conclusions

Focus group responses confirm the great distance between policy as intended and policy as interpreted from district to district as well as at the school building level. As systems theory suggests, legislating educational practice through state regulations is not, by itself, a sufficient

strategy to institute program changes (Moran et al., 2022); it does not consider the organization of P-12 education as an entity with many components and therefore, the potential for structures and processes to stray from policy intentions.

Adoption of regulations is but one step on the journey from policy design to the achievement of its intended outcomes: follow through is essential. “The adoption of a new policy is really just the starting point: A complex set of actions must unfold to translate a new statute, policy or court ruling into changes in practice in classrooms, schools and institutions and for those changes in practice to translate into meaningful improvements for students” (Grantmakers for Education, 2011, p.5). At the state level, NYSED should include efforts to gather feedback—an essential aspect of systems models—from educators in the field whose beliefs and actions have substantial impact on policy success. At the building level, school leaders and school counselors should end the finger-pointing, accept responsibility for the amended regulations expectations and outcomes, and commit to building coherence across roles to achieve policy goals with fidelity.

By revising the policy governing school counseling, New York State has opened another pathway to achieving the significant goal of improving school success and student outcomes. Providing equitable access to school counseling programs for every K-12 student has the potential to eliminate existing barriers and enhance greater possibilities for all students, including those who have been underserved by years of traditional practice.

While this study focuses on one state of the United States, the challenges it identifies are not confined to national borders. The recommendations offered by the authors are relevant and adaptable to diverse cultural and educational settings as previous citation have revealed. School counselors and school leaders can work together to implement and sustain comprehensive school counseling programs that are sensitive both to their specific locales as well as the universal needs of students.

ORCID ID

Carol Dahir  <https://orcid.org/0000-0002-6418-3438>

Robert Feirsen  <https://orcid.org/0000-0002-3861-7562>

Cameka Hazel  <https://orcid.org/0000-0002-3536-1290>

Funding

The authors received no financial support for the research, authorship, and/or publication of this article.

Conflict of Interest Statement

The authors have no conflicts of interest to disclose.

References

- Acocella, I. (2012). The focus groups in social research: advantages and disadvantages. *Quality & Quantity: International Journal of Methodology*, 46(4), 1125-1136.
<https://doi.org/10.1007/s11135-011-9600-4>
- American School Counselor Association. (2019). *American School Counselor Association National Model: A framework for school counseling programs* (4th ed.). Author.

- American School Counselor Association. (2022). *The role of the school counselor*.
<https://www.schoolcounselor.org/getmedia/ee8b2e1b-d021-4575-982c-c84402cb2cd2/Role-Statement.pdf>.
- American School Counselor Association (2023). *The school counselor's role*.
<https://www.schoolcounselor.org/getmedia/ee8b2e1b-d021-4575-982cc84402cb2cd2/Role-Statement.pdf>
- Amir, A., Guha, C., Carter, S., & Juare, A. (2024). Focus groups. In J.E. Edlund & A.L. Nichols (Eds.), *The Cambridge handbook of research methods and statistics for the social and behavioral sciences, Volume 2: Performing research*. Cambridge University Press.
<https://doi.org/10.1017/9781009000796>
- Bayeni, S.D., & Bhengu, T.T. (2018). Complexities and contradictions in policy implementation: Lived experiences of three school principals in South Africa. *Sage Open*, 8(3).
<https://doi.org/10.1177/2158244018792037>
- Bardhoshi, G., & Duncan, K. (2009). Rural school principals' perception of the school counselor's role. *Rural Educator*, 30(3), 16-24.
- Bentz, V. M., & Shapiro, J. J. (1998). *Mindful inquiry in social research*. Sage.
- Camelford, K.G., & Ebrahim, C.H. (2017). Factors that affect implementation of a comprehensive school counseling program in secondary schools. *VISTAS 2017*, Article 9.
<https://manifold.counseling.org/read/factors-that-affect-implementation-of-a-comprehensive-school-counseling-program-in-secondary-schools/section/b0662601-0795-419c-a2da-e1d989cf6a4a>
- Carey, J. C., K. Y. Fan, L. He, and Y. Ying Jin. 2020. Five dimensions of school-based counseling practice: Factor analysis identification using the International Survey of School Counselors' COMPARE 17 Activities. *Journal of School-Based Counseling Policy and Evaluation*, 2(1), 4–21. <https://doi.org/10.25774/0rpq-0v54>
- Chandler, J. W., Burnham, J. J., Riechel, M.E. K., Dahir, C. A., Stone, C. B., Oliver, D. F., Davis, A. P., & Bledsoe, K. G. (2018). Assessing the counseling and non-counseling roles of school counselors. *Journal of School Counseling*, 16(7), Article 7.
<https://files.eric.ed.gov/fulltext/EJ1182095.pdf>
- Cigrand, D. L., Havlik, S. G., Malott, K. M., & Jones, S. G. (2015). School counselors united in professional advocacy: A systems model. *Journal of School Counseling*, 13(8), Article 8.
<https://files.eric.ed.gov/fulltext/EJ1066331.pdf>
- Cinotti, D. (2014). Competing professional identity models in school counseling: A historical perspective and commentary. *Professional Counselor*, 4(5), 417-425.
<https://doi.org/10.15241/dc.4.5.417>
- Cinotti, D., Feirsen, R., Dahir, C. A., & Kim, N. (2022). Leveraging state policy to promote school counselor–principal collaboration. *Professional School Counseling*, 26(1c).
<https://doi.org/10.1177/2156759X221134662>
- Cohen, J., Loeb, S., Miller, L.C., & Wyckoff, J.H. (2020). Policy implementation, principal agency, and strategic action: Improving teacher effectiveness in New York City middle schools. *Educational Evaluation and Policy Analysis*, 42(1), 134-160.
<https://doi.org/10.1177/0895904805276143>
- College Board. (2021). *Enhancing the principal–school counselor relationship: A toolkit*.
<https://collegeboardcounselors.clickhelp.co/articles/#!enhancing-the-principal-school-counselor-relationship-a-toolkit-publication/cover>

- Council for the Accreditation of Counseling and Related Educational Programs (2024). 2024 *CACREP standards*. <https://www.cacrep.org/for-programs/#2024-standards>
- Creswell, J. W., & Báez, J. C. (2020). *30 essential skills for the qualitative researcher*. Sage.
- Dahir, C. (2025). The ASCA National Standards and the ASCA National Model. In B. T. Erford (Ed.), *Professional school counseling: A handbook of theories, programs, and practices* (4th ed., pp.123-137). Cognella.
- Dahir, C., Feirsén, R., Hazel, C. (2023, April 15). *Exploring perceptions: Policy, principals, and school counselor practice*. Paper presented at the American Educational Research Association Annual Meeting, Chicago, IL. <https://doi.org/10.3102/2005540>.
- Dahir, C., & Geesa, R. L. (2022). Introduction to the special issue: Creating social capital through school counselor-principal collaboration. *Professional School Counseling*, 26(1c). <https://doi.org/10.1177/2156759X221134>
- Dahir, C. A., Cinotti, D.A., & Feirsén, R. (2019). Beyond compliance: Assessing administrators' commitment to comprehensive school counseling. *NASSP Bulletin*, 103(2), 118-138. <https://doi.org/10.1177/0192636519830769>
- Donaldson, M.L., Mavrogordato, M., Youngs, P., Dougherty, S., & Ghanem, R.A. (2021). Doing the "real work": How superintendents' sensemaking shapes principal evaluation policies and practices in school districts. *AERA Open*, 7(1), 1-16. <https://doi.org/10.1177/2332858420986177>
- Dose, E., Desrumaux, P., & Bernaud, J-L. (2022). A model of the well-being among French school counselors: Effects of personal and psychosocial variables. *International Journal for Educational and Vocational Guidance*, 23, 337-361. <https://doi.org/10.1007/s10775022-09522-6ff>
- Fallon, L. M., Everett, S., La Salle, T. P., Luh, H. J., Feinberg, A., & Sugai, G. (2023). The what, why, and how for school counselors. In E. Goodman-Scott, J. Betters-Bubon, P. Donohue, & J. Olsen. (Eds.). *The school counselor's guide to multi-tiered systems of support (2nd edition)* (pp.1-27). Routledge.
- Fan, K. Y., Carey, J. C., Martin, I., & He, L. (2019). Activities and role of school-based counselors in the US: A national survey of American Counseling Association members. *Journal of School-Based Counseling Policy and Evaluation*, 1(2), 34-50. <https://doi.org/10.25774/8nz2-4y62>
- Feirsén R., Dahir, C., Cinotti D. (2021). Moving from compliance to cohesion: Making mandates meaningful. *Journal of School Counseling*, 19, Article 25. <http://www.jsc.montana.edu/articles/v19n25.pdf>
- Fitch, T., Newby, E., Ballesterro, V., & Marshall, J. L. (2001). Future school administrators' perceptions of the school counselor's role. *Counselor Education and Supervision*, 41(2), 89-99. <https://doi.org/10.1002/j.1556-6978.2001.tb01273.x>
- Fye, H. J., Miller, L. G., & Rainey, J. S. (2017). Predicting school counselors' supports and challenges when implementing the ASCA National Model. *Professional School Counseling*, 21(1). <https://doi.org/10.1177/2156759X18777671>
- Geesa, R. L., Odell, K. M., Kruczek, T., Elam, N. P., Boyland, L. G., & Ceresa, M. L. (2022). A principal-school counselor relational leadership model to improve student mental well-being. In F. English (Ed.) *The palgrave handbook of educational leadership and management discourse* (pp. 1865-1890). Palgrave Macmillan.
- Grantmakers for Education. (2011). *Implementing educational policy: Getting from what now? to what works*. Grantmakers Institute.

- Grissom, J.A., Egalite, A., Lindsay, C.A. (2021). *How principals affect students and schools: A systematic synthesis of two decades of research*. Wallace Foundation.
<https://wallacefoundation.org/report/how-principals-affect-students-and-schools-systematic-synthesis-two-decades-research>
- Harrison, M. G., King, R. B., & Hocson, S. M. G. (2023). The roles of school counsellors in the Philippines: Challenges and opportunities. *Journal of Psychologists and Counsellors in Schools*, 33(2), 161-174. <https://doi.org/10.1017/jgc.2023.4>
- Havlik, S., Ciarletta, M., & Crawford, E. (2018). “If we don’t define our roles, someone else will”: Professional advocacy in school counseling. *Professional School Counseling*, 22(1). <https://doi.org/10.1177/2156759X19848331>
- Hocson, S. M. G., Subong, F. R. D., & Clavecillas, E. B. (2024). School counselling in the Philippines: Challenges and new directions. In *School counselling in East and South-East Asia* (pp. 91-112). Routledge.
- Husserl, E. (2001). *Phenomenology and the foundations of the sciences*. Springer Science & Business Media.
- Jones, S., Ricks, J., Warren, J., Mauk, G. (2019). Exploring the career and college readiness of high school students serviced by RAMP and non-RAMP school counseling programs in North Carolina. *ASCA Research Report*.
<https://www.schoolcounselor.org/getmedia/05f49ef2-872f-4dd7-b3b5-ce4d60fbb7f4/Effectiveness-CCR-RAMP-Report.pdf>
- Kakar, V., & Oberoi, N. (2016). Counseling in Indian schools: Checkmating the past. *International Journal of Education and Management Studies*, 6(3), 347-357.
http://www.iahrw.com/index.php/home/journal_detail/21#list
- Karaman, Ş. G., & Özbek, S. K. (2024). Problems encountered in the counseling process in the context of cultural sensitivity and coping methods: Opinions of school counselors. *Turkish Psychological Counseling and Guidance Journal*, 14(74), 347-375.
https://doi.org/10.17066/tpdrd.1384733_5
- Langston, S., & Van Gordon, W. (2024). A phenomenological analysis of the role and well-being challenges experienced by professional international school counsellors. *British Journal of Guidance & Counselling*, 52(5), 845-862.
<https://doi.org/10.1080/03069885.2023.2264477>
- Lauterbach, A. A., Harrington, K., Yakut, A. D., & Krezmien, M. (2018). School counselor knowledge, beliefs, and practices related to the implementation of standards-based comprehensive school counseling in the United States. *Journal of School-Based Counseling Policy and Evaluation*, 1(1), 1–16. <https://doi.org/10.25774/7hhc-x195>
- Lemberger, M., Carbonneau, K., Selig, J., & Bowers, H. (2018). The role of social-emotional mediators on middle school students’ academic growth as fostered by an evidence-based intervention. *Journal of Counseling & Development*, 96(1), 27-40.
<https://doi.org/10.1002/jcad.12175>
- Lowery, K., Quick, M., Boyland, L., Geesa, R. L., & Mayes R. D. (2018). It wasn’t mentioned and should have been: Principals’ preparation to support comprehensive school counseling. *Journal of Organizational and Educational Leadership*, 3(2). Article 3.
https://digitalcommons.gardner-webb.edu/joel/vol3/iss2/3?utm_source=digitalcommons.gardner-webb.edu%2Fjoel%2Fvol3%2Fiss2%2F3&utm_medium=PDF&utm_campaign=PDFCoverPages

- Love, B., Vetere, A., & Davis, P. (2020). Should interpretative phenomenological analysis (IPA) be used with focus groups? Navigating the bumpy road of “iterative loops,” idiographic journeys, and “phenomenological bridges.” *International Journal of Qualitative Methods*, 19, <https://doi.org/10.1177/1609406920921600>
- Martin, I., Lauterbach, A., & Carey, J. (2015). The identification of factors affecting the development and practice of school-based counseling in different national contexts: A grounded theory study using a worldwide sample of descriptive journal articles and book chapters. *International Journal for the Advancement of Counselling*, 37(4), 305–318. <https://doi.org/10.1007/s10447-015-9245-4>
- Matua, G. & Wal, Dirk. (2015). Differentiating between descriptive and interpretive phenomenological research approaches. *Nurse Researcher*. 22(6), 22-27. <http://doi.10.7748/nr.22.6.22.e1344>
- Mau, W. J., Li, J., & Hoetmer, K. (2016). Transforming high school counseling: Counselors’ roles, practices, and expectations for students’ success. *Administrative Issues Journal: Connecting Education, Practice, and Research*, 6(2), 83–95. <https://doi.org/10.5929/2016.6.2.5>
- McMahon, H., & Mason, E. (2019). Ecological school counseling. In C. T. Dollahide & M. E. Lemberger-Truelove (Eds.). *Theories of school counseling for the 21st century* (pp. 241-265). Oxford University Press.
- McGowan, S. G. (2021). The high school counselor's role: Still dubious after all these years. *Delta Kappa Gamma Bulletin*, 88(1), 24-39. https://www.researchgate.net/publication/355381002_2021-DKG_Journal_Sept_McGowan_article
- Moran, R.M.R., Hong, H., Keith, K.J., Fisher, S. & Wood, L. (2022). Top down policy and the intersection of teacher belief and action: A photo elicitation study of the impacts of common core state standards. *Critical Questions in Education*, 13(3), 228-244. <https://academyforeducationalstudies.org/wp-content/uploads/2022/10/moran-et.-al-final.pdf>
- Morris, O. (2024). *The experiences of Jamaican secondary school counselors who provide psychological support to adolescents* (Doctoral dissertation, Walden University). ProQuest Dissertations & Thesis Global. (Publication No. 31483746). <https://scholarworks.waldenu.edu/cgi/viewcontent.cgi?article=17616&context=dissertations>
- Morshed, M. M., & Carey, J. (2020). Development of a taxonomy of policy levers to promote high quality school-based counseling. *Journal of School-Based Counseling Policy and Evaluation*, 2(2), 95-101. <https://doi.org/10.25774/9scb-j720>
- Moustakas, C. (1994). *Phenomenological research methods*. Sage.
- Mullen, P. R., Chae, N., Backer, A., & Niles, J. (2021). School counselor burnout, job stress, and job satisfaction by student caseload. *NASSP Bulletin*, 105(1), 25-42. <https://doi.org/10.1177/0192636521999828>
- National Association of Secondary School Principals (2018). *Building ranks K–12: A comprehensive framework for effective school leaders*. <https://www.nassp.org/building-ranks/>
- National Policy Board for Educational Administration (2015). *Professional standards for educational leaders*. https://www.npbea.org/wp-content/uploads/2017/06/Professional-Standards-for-Educational-Leaders_2015.pdf

- New York State Education Department (2013). *School counseling regulations*.
<https://www.regents.nysed.gov/sites/regents/files/1013p12hed2%5b1%5d.pdf>
- New York State Education Department (2017). *Proposed amendment of sections 52.21, 100.2(j) and part 80 of the commissioner's regulations relating to school counseling, certification requirements for school counselors and program registration requirements for school counseling preparation programs*.
<https://www.regents.nysed.gov/sites/regents/files/517brca14.pdf>
- New York State Education Department. (2018). *Memo RE: Amendments to commissioner's regulations related to school counseling*.
<https://www.p12.nysed.gov/sss/SchoolCounselingMemo.html>
- New York State Education Department (2018). *Guidance pertaining to commissioner's regulation §100.2(j) guidance and comprehensive developmental programs: School counseling/guidance programs*.
<https://www.p12.nysed.gov/sss/documents/SchoolCounselingPlanGuidance.pdf>
- Norqvist, L., & Ärlestig, H. (2021). Systems thinking in school organizations—perspectives from various leadership levels. *Journal of Educational Administration*, 59(1), 77-93.
<https://doi.org/10.1108/JEA-02-2020-0031>
- Olsen, J., Parikh Foxx, S., Flowers, C., & Hayakawa, K. (2023). An analysis of school counselors time spent on ASCA aligned activities. *Journal of Counseling Research and Practice*, 8(1), 8. <https://doi.org/10.56702/UCKX8598/jcrp0701.3>
- Palmer, M., Larkin, M., De Visser, R., & Fadden, G. (2010). Developing an interpretive phenomenological approach to focus group data. *Qualitative Research in Psychology*, 7(2), 99-121. <https://psycnet.apa.org/doi/10.1080/14780880802513194>
- Parker, R., Thomsen, B.S., & Berru, A. (2022). Learning through play at school—A framework for policy and practice. *Frontiers in Education*, 7, 751801.
<https://doi.org/10.3389/educ.2022.751801>
- Popov, N., & Spasenovic, V. (2020, July 18). *School counseling: A comparative study in 12 countries* [Conference presentation]. Annual International Conference of the Bulgarian Comparative Education Society (BCES), Online. <https://eric.ed.gov/?id=ED608402>
- Post, C., Sarala, R., Gatrell, C., & Prescott, J. E. (2020). Advancing theory with review articles. *Journal of Management Studies*, 57(2), 351-376.
- Randick, N. M., Dermer, S., & Michel, R. E. (2018). Exploring the job duties that impact school counselor wellness: The role of RAMP, supervision, and support. *Professional School Counseling*, 22(1), 1-11. <https://doi.org/10.1177/2156759X18820331>
- Rock, W. D., Remley, T. P., & Range, L. M. (2017). Principal-counselor collaboration and school climate. *NASSP Bulletin*, 101(1), 23-35.
<https://doi.org/10.1177/0192636517698037>
- Rutledge, M. L., Burgess, M., Bledsoe, K. G., & Stickl Haugen, J. (2023). Examining Indiana's state-recognized comprehensive school counseling programs, caseload, and academic outcomes of diverse student populations. *Journal of School-Based Counseling Policy and Evaluation*, 5(2), 45-57. <https://doi.org/10.25774/7p0d-h080>
- Sanders, M. G. (2014). Principal leadership for school, family, and community partnerships: The role of a systems approach to reform implementation. *American Journal of Education*, 120(2), 233-255. <https://doi.org/10.1086/674374>

- Savitz-Romer, M., Nicola, T. P., Rowan-Kenyon, H. T., & Carroll, S. (2024). A landscape analysis of state-level school counseling policy: Perspectives from state officials. *Educational Policy*, 38(2), 421-447.
- Shaha, M., Wenzel, J., & Hill, E.E. (2011). Planning and conducting focus group research with nurses. *Nurse Researcher*, 18(2), 77-87. <https://doi.org/10.7748/nr2011.01.18.2.77.c8286>
- Shimoni, A., & Greenberger, L. (2014). School counselors deliver information about school counseling and their work: What professional message is conveyed? *Professional School Counseling*, 18(1), 15-27. <https://doi.org/10.1177/2156759X000180011>
- Sheperis, C. J., Young, J. S., & Daniels, M. H. (2017). *Counseling research: Quantitative, qualitative, and mixed methods* (2nd ed.). Pearson.
- Smith, D.A. (2018). Phenomenology. In E. N. Zalta (ed.). *The Stanford Encyclopedia of Philosophy*. Stanford University.
- Stone, C. (2022). School administrators and school counselors' legal and ethical alliance. *Professional School Counseling*, 26(1c), <https://doi.org/10.1177/2156759X221134668>
- Stosich, E.L. (2017). Leading in a time of ambitious reform. *The Elementary School Journal*, 117(4), 539-564. <https://doi.org/10.1086/691585>
- Thomas, E., & Dey, A. M. (2020). Role of school counselors and the factors that affect their practice in India. *Journal of School-Based Counseling Policy and Evaluation*, 2(1), 22-28. <https://doi.org/10.25774/t4b6-9880>
- Yavuz, O., Dahir, C., & Gumuseli, A. (2017). School principal perceptions of the school counselor's role: Traditional or transformed? *Journal of Educational Leadership, Policy and Practice*, 32(2), 81-97. <https://doi.org/10.21307/jelpp-2017-0021>
- Viennet, R. & Pont, B. (2017). Education policy implementation: A literature review and proposed framework. *OECD Education Working Papers*, 162. <https://doi.org/10.1787/fc467a64-en>
- Watkins, S., Anthony, A.B., & Beard, K.S., (2021). Principals' sensemaking of leading under accountability and innovation policies. *Leadership and Policy in Schools*. 20(30), 522-542. <https://doi.org/10.1080/15700763.2020.1734207>