

Improving Equity and Access: Understanding School-Based Mental Health Models, Contexts, and Outcomes in the United States

Katrina A. Jean
University of Arizona

Lia D. Falco
University of Arizona

School-based mental health models vary considerably, and extant research spans many disciplines, examines a range of services, and measures a variety of outcomes. For school-based mental health (SBMH) services to be effective, it is important to understand how they are implemented and how they affect outcomes for children in schools. Although SBMH programs have expanded nationwide, there is a lack of comprehensive research examining how these programs have been implemented across contexts. The purpose of this integrative literature review is to synthesize 23 years of research on implementation approaches, service delivery models, and associated outcomes that promote positive development for children and youth; with particular attention to those from historically underserved communities and demographic groups. Publications from 2000-2023 within the U.S. were identified through databases using an iterative keyword search and screened according to inclusion and exclusion criteria. The remaining 127 articles were reviewed and categorized according to the model, framework, context, and keys to implementation. The synthesis identified three main approaches used for facilitating SBMH services. Frequently cited keys to successful implementation were documented by frequency across articles. The findings suggest that SBMH services are implemented in a variety of ways and would benefit from adaptations based on cultural and contextual considerations. Implications for SBMH research, practice, and policy in the United States are discussed. The discussion includes suggestions for effective SBMH models and approaches given the contextual considerations and barriers schools may face.

Keywords: school-based mental health, outcomes, policy, equity, access

Introduction

Childhood mental health disorders affect an estimated 20-25% of children worldwide (Kase et al., 2017). According to the State of Mental Health in America report (Reinert et al., 2024), the prevalence of major depressive episodes for youth ages 12-17 has nearly doubled over the course of a decade, increasing from 8% to 16% between the years 2012 to 2022. There has been an increase in depression and anxiety worldwide with 25% of youth experiencing clinically elevated symptoms since 2020 (Racine et al., 2021). Other findings from recent studies reveal that other mental health indicators such as substance use and thoughts of suicide are rising among youth

between the ages of 6-21 years of age (Halladay et al., 2020; Young et al., 2023). These challenges have worsened in the wake of the COVID-19 pandemic (Samji et al., 2022; Zabek et al., 2023). Yet, most school-aged youth do not receive adequate care for their mental health conditions (Graaf et al., 2022; Kern et al., 2022) with 48% reporting an unmet need for treatment (Reinert et al., 2024).

For a variety of reasons — financial, environmental, personal, and cultural — children do not receive needed mental health services (Damian et al., 2022; Graaf et al., 2022; Toure et al., 2022). The 2024 State of Mental Health in America Report showed that nearly half of youth do not receive treatment and of those who did receive treatment, only 65% said it helped (Reinert et al., 2024). The 2022-2023 National Survey of Children's Health (Child and Adolescent Health Measurement Initiative, 2023) showed that families faced difficulties obtaining mental health care for children who were in need. Thirty one percent found it somewhat difficult, 19% found it very difficult, and 5% were not able to obtain care. In total, 56% of families faced challenges accessing care. For youth who do receive care most receive fewer than four sessions and, for youth in poverty, access is even more limited (Hoover & Bostic, 2021).

Overall, access to mental health care for youth in the U.S. remains limited (Mojtabai & Olfson, 2020), and youth from the most vulnerable demographic groups such as Black, Indigenous, People of Color (BIPOC), Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ) and low socioeconomic status (SES) are even less likely to receive care compared to their middle-class and white counterparts, even when faced with similar mental health problems (Gaias et al., 2022; Rider et al., 2018). Evidence of large unmet mental health needs for BIPOC and low SES status children and adolescents suggests that barriers to access, including cost and transportation, significantly impact the utilization of mental health services among these populations and other groups of underserved youth (Hoover & Bostic, 2021; Ofendu et al., 2017; Planey et al., 2019). This points to the need for more innovative approaches for service delivery to expand access and improve outcomes for young people who might not otherwise receive mental health care. When considering the number of children identified for services in comparison with those who do receive services, providing care in a natural environment such as a school could dramatically increase the number of children who are able to access mental health support (Hoover & Bostic, 2021; Merianos et al., 2017; Raviv et al., 2022).

School-Based Mental Health Services

Student mental health needs are increasing at a time when it is especially difficult to access mental health care in the U.S. (Hodgkinson et al., 2017; Mojtabai & Olfson, 2020; Zabek et al., 2023). School-based services can address these needs by providing timely and convenient access to mental health care for many children (Hoover & Bostic, 2021; Hess et al., 2017; Raviv et al., 2022; Storey et al., 2023). Schools provide a natural environment to facilitate early identification, prevention, and intervention (Duck et al., 2023; Kern et al., 2017; Storey et al., 2023). Moreover, school-based services reduce significant barriers to accessing care including cost, transportation and time (Murphy & Kim, 2023; Smith-Ramey et al., 2023). School-based mental health care can also reduce other barriers such as scheduling conflicts, provider availability, and stigma (Rossen & Cowen, 2014; Powers et al., 2013). The familiarity of school and ease of access can alleviate some of the stigma associated with help-seeking, and there is evidence showing that school based mental health literacy interventions can reduce stigmatizing attitudes and beliefs about mental

disorders (Ma et al., 2023). Schools can provide other supports that enable a more holistic system of care.

Purpose of this Review

While comprehensive services are increasingly implemented in schools across the United States, implementation frameworks vary and the impact on outcomes is difficult to surmise. At present, there is a robust yet disparate body of literature examining school-based mental health models and outcomes. As focus on youth mental health and school-based mental health services expands, there is a need to examine implementation approaches, populations served, and contextual factors to inform practice and policy to better understand links to student outcomes. Because extant research spans many disciplines, examines a range of service frameworks, and measures a variety of outcomes, there is a need to review the literature to better understand the possibilities and challenges associated with school-based mental health services. Therefore, this review synthesizes findings related to school-based mental health services to address the following questions:

1. What are the most frequently utilized implementation models and frameworks for school-based mental health services?
2. What are the cultural and contextual considerations for effective school-based mental health services?
3. What outcomes are associated with school-based mental health services?

This review will identify, summarize, and describe the models of school-based mental health service provision that are effective at supporting positive developmental outcomes, especially for children and youth from historically under-served communities and demographic groups. In doing so, we hope to bridge related areas of work and provide mental health practitioners, educators, researchers, and policymakers with an important resource for implementing school-based mental health services in the United States.

Method

Integrative review is a methodology used to organize and evaluate the extant body of evidence related to a particular topic. It is often utilized in medical and social science research where contemporary evidence-based practice is essential to inform research and policy decisions. According to Souza and colleagues (2010) integrative review is the preferred tool of evidence-based practice. It is the most comprehensive methodological approach of reviews because it includes a range of studies and publication types that combine data from theoretical, practical, and empirical literature (Souza et al., 2010; Toronto, 2020). An integrative review synthesizes and evaluates current knowledge of a topic to provide new insights therein (Torraco, 2005). Integrative reviews are central to a “sensemaking/sensegiving circle of scholarship” (Huff, 2009, p. 4). A comprehensive integrative review synthesizes the current state of knowledge of a topic and brings together multiple perspectives from various related disciplines. Integrative reviews provide scholars who are interested in a topic, an avenue to develop new research programs that might not have emerged from within a single community of practice (Cronin & George, 2020). According to Russell (2005) high quality, rigorous reviews can provide a significant contribution to a particular body of knowledge and, consequently, to policy, practice, and research. For this review, we followed the guidelines for conducting an integrative review (Beyea & Nicoll, 1998; Whitmore

& Knafl, 2005) with the goal of synthesizing theory, research, and practice related to the effectiveness of school-based mental health services.

Literature Search Strategy

Using the databases Academic Search Ultimate, JSTOR, ProQuest, PsycInfo, EBSCOhost, and the search engine Google Scholar we conducted an iterative keyword search (Wei, 2012) to locate articles for this review. Academic Search Ultimate, JSTOR, ProQuest, PsycInfo, and EBSCOhost databases were utilized because of their ability to locate full-text academic journal publications in multi-disciplinary social science records. Google Scholar was also utilized because of its ability to search multiple scholarly databases and to locate gray literature including technical reports, white papers, and other documents that are not published in academic journals but may be important sources of information.

An iterative keyword search (Wei, 2012) is optimal for maximizing search effectiveness of large data sets (including document and data base searches) by yielding a focused and accurate data set for review (Eames et al., 2010). This technique is considered an effective way to conduct a search that is comprehensive and precise, which is recommended for an integrative review (Beyea & Nicoll, 1998). Search terms included the following keywords or keyword combinations: school-based mental health, school-based mental health outcomes, school-based mental health intervention, and school-based mental health services. We employed the keyword search in each database and search engine until at least three duplicate records were identified. Publications were limited to the years 2000-2023, and only studies conducted in the U.S. were included because school systems and support services vary considerably by country. A total of 158 articles were identified by the authors using the search terms, and 127 were included for this review. Following the search, all records were uploaded into our reference management system and de-duplicated. Title and abstract screening was conducted independently by two reviewers using predefined inclusion criteria to maintain consistency. Inclusion criteria for articles were as follows: English written U.S. publications, school setting, embedded school-based services, school-employed or community-employed providers, universal screening and/or interventions, targeted mental health interventions (specific diagnosis), and 2000-present. Exclusion criteria were teacher delivered interventions, SEL curriculum, mental health promotion/prevention initiatives, mental health literacy programs, and studies conducted outside of the U.S. Full-text articles were subsequently reviewed for eligibility by the same reviewers. Inter-reviewer disagreements were addressed through discussion and consensus.

School-based mental health services were operationalized as interventions and supports delivered by trained mental health professionals (e.g., counselors, social workers, psychologists) that are integrated into the school system. In contrast, prevention and promotion initiatives such as social emotional learning curricula were excluded unless they were delivered by a mental health professional. Teacher delivered interventions were excluded to maintain a focus on clinically oriented services, whereas services delivered by community-employed providers were included if they were embedded within the school setting or coordinated with school personnel. Embedded school-based services were defined as services that were integrated into the school and part of a coordinated system of support. This includes collaboration with community-based therapy services that are provided on campus physically or virtually during school hours.

Table 1
Inclusion and Exclusion Criteria for Review

Publication Type	Frequency
Primary research (quantitative or qualitative) examining school-based mental health services or mental health interventions (targeted or universal) embedded in school settings, including reports and dissertations	53
Meta-analyses and literature reviews specific to school-based mental health.	7
Conceptual articles, books, and chapters on school-based mental health.	36
Practice articles (those that address school-based mental health in practice) Guidelines and policy papers (best practices and principles for school-based mental health)	22
Inclusion criteria: English written U.S. publications, school setting, embedded school-based services, school-employed or community-employed providers, universal screening and/or interventions, targeted mental health interventions (specific diagnosis), 2000-present	
	N = 127
Exclusion criteria: teacher delivered interventions, SEL curriculum, mental health promotion/prevention initiatives, mental health literacy programs	

Articles were reviewed and categorized according to the model, framework, context, and keys to implementation. Approaches were documented accordingly by use in each study (see Table 2). The populations of focus were recorded as cited in each study (see Table 3). Key study characteristics important for implementation were documented in a summary matrix (see Table 4). In the following sections we will discuss the frameworks that have been put forth, approaches used within those frameworks, keys to implementation and common barriers to facilitation.

Public Health Approach

A public health approach is the foundation for many school-based services (Hess et al., 2017; Hoover et al., 2019; Hoover & Bostic, 2021; Nastasi et al., 2011) and was cited in 17 articles from this review as an important method for prevention and intervention (see Table 5). The public health perspective within a school-based service context can be defined as an approach that utilizes prevention methods like universal screening (Dowdy et al., 2010), emphasizes early intervention including psychoeducation (Boustani et al., 2020), offers tiered supports for mental health and behavioral problems (Hess et al., 2017), is a systemic way for implementing effective services

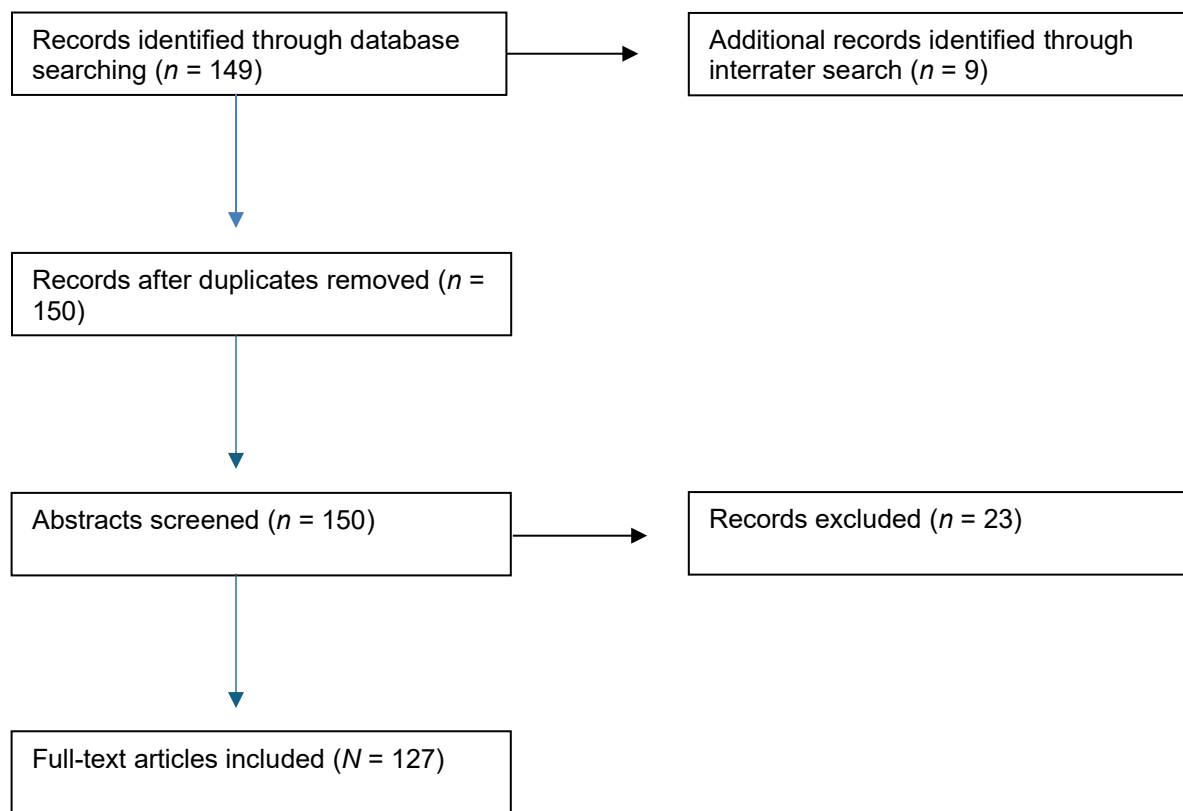


Figure 1. Review Process

(Friedrich et al., 2010), and is a guide for equipping school-based systems of care following disasters (Nastasi et al., 2011). A public health approach that situates mental health services in schools is an effective way to deliver services because of its ability to respond to a variety of needs using one point of access (Hoover & Bostic, 2021).

School Based Mental Health (SBMH) services are the most common approach to facilitating mental health care services for children (Arora et al., 2019; Smith-Ramey et al., 2023). SBMH care is a population-based approach that draws from public health and prevention science models. This approach facilitates access to mental health services that children would not otherwise seek or be able to access outside of school (Arora et al., 2019; Hoover & Bostic, 2021). Children and adolescents spend most of their time in school and so it is a natural setting to screen and deliver services, furthermore; families are familiar with the school and perceive less stigma, mental health professionals are embedded in the environment where many challenging behaviors occur and are better able to integrate interventions (Doll et al., 2017). Considering these factors, the government and many organizations have identified elementary and secondary schools as optimal places to provide mental health care services (Hoover & Bostic, 2021; Walter et al., 2019). Students are more likely to receive mental health care through school-based systems and typical barriers such as transportation, stigma, and provider availability are reduced, thereby increasing accessibility to services (Hoover & Bostic, 2021; Smith-Ramey et al., 2023; Stephan et al., 2007). For students in rural areas or for those living in poverty, school-based

services are often the only feasible option for receiving care (Rossen & Cowan, 2014; Smith-Ramey et al., 2023).

SBMH services offer multiple benefits, including increased access to care through providers with behavioral and mental health expertise. SBMH services improve accessibility to care through services that are embedded within schools, becoming part of the community's comprehensive system of care (Doll et al., 2017; Hoover & Bostic, 2021; Frey et al., 2022). Services are provided by school employees who are familiar with the school community, and who also provide guidance to personnel that interact with students in need of support. Furthermore, schools are often the place where children's behaviors become challenging and where interventions are most needed. Lastly, schools are situated to better integrate interventions, they are a place that families are familiar with, and ultimately a place to promote wellness within communities (Doll et al., 2017). Indeed, Atkins and colleagues (2010) posit that education and mental health have a reciprocal agenda. They suggest a change in the fundamental framework of education in the U.S. where the goal of mental health includes effective schooling, and the goal of effective schools includes the healthy functioning of students.

Table 2
Approaches to Facilitating SBMH Services

Approaches	Definitions	Frequency
ESMH	Expanded School Mental Health, a continuum of services for prevention and intervention.	7
MTSS	Multitiered Systems of Support, a continuum of support using universal prevention for tier 1 and targeted interventions for tier 2 and tier 3.	38
SBHC	School-based Health Center, primary health care, behavioral health, dental, and vision services.	23

Multitiered Systems of Support

Multitiered Systems of Support (MTSS) is the most common approach to deliver SBMH services, with at least 38 articles using it as an approach for facilitation (see Table 2) and has become integrated in many states as part of the general education framework (Kern et al., 2022). MTSS grew out of the 1990s model known as Response to Intervention. Beginning in the 2000s, Response to Intervention merged with an educational orientation toward positive behavioral support and became MTSS (Jimerson et al., 2015) thereafter, the expansion of MTSS across the U.S. was funded by grants from the U.S. Department of Education.

MTSS is situated as a public health approach for several reasons. It focuses on prevention by using universal screening to identify students in need of intervention; services are tailored according to need, it is a systemic method of service implementation, and it is designed to monitor outcomes associated with social determinants of health (Boustani et al., 2020; Hess et al., 2017). Thus, many scholars who have studied school based mental health systems of care have promoted the use of the MTSS framework as a public health approach and method of service delivery (Arora

et al., 2019; Capella et al., 2008; Christner et al., 2007, Connors et al., 2022; Dowdy et al., 2015; Hess et al., 2017 Hoover & Bostic, 2021).

The MTSS framework operates on a continuum tailored to need and facilitates promotion, prevention, and tiered level interventions. There are three tiers within the framework, beginning with tier one instruction, known as universal instruction, continuing with tier two instruction designed for smaller groups of students who need additional support; and, lastly, tier three interventions designed for the smallest group of students who need the most specialized support. MTSS is implemented in numerous ways depending on the context, school site, and staff availability. However, the tiered system is always oriented towards behavior support, social support, and academic support. In this framework positive behavioral supports are considered foundational (Weist et al., 2022). The success of an MTSS approach is determined by several key factors, including the use of culturally responsive practices, community engagement, interagency collaboration, continuous evaluation and data-based decision making, an ecological framework, and the integration of universal screening and programming within the general curriculum (Arora et al., 2019; Battal et al., 2020; Capella et al., 2008; Choi et al., 2022; Connors et al., 2022; Hoover & Bostic, 2021; Kern et al., 2017).

Universal screening is a particularly important component of MTSS with 15 articles citing this practice as an important key to implementation. Battal et al. (2020) describes how universal screening provides schools with accurate data that represents student need across domains. Another study documented the logistical challenges associated with screening and proposed strategies to develop tailored and scalable screening processes in schools (Connors et al., 2022). DeBoer et al. (2022) suggest conducting culturally responsive assessments and interpreting screening data with the acknowledgment of the impact of deficit-based ideologies. Hoover & Bostic (2021) explain how universal screening, progress monitoring, early identification and intervention are all fundamental components in MTSS. These processes enable data-based decision-making and are promoted as strategies for promoting health and well-being post COVID (National Academies of Sciences Engineering and Medicine, 2021).

Table 3
Populations of Focus in Research

Populations	Frequency
Communities in poverty	23
Historically Marginalized	20
High Risk	6
Immigrant	7
LGBTQ+	3
Rural	5
Students with Disabilities	6
Urban	12

Several scholars explain that the universal tier one component of an MTSS framework can promote equity-based school services (DeBoer et al., 2022) or detract from equity (Moore et al., 2023) and contribute to systemic racism. For example, teachers and staff may hold implicit biases that affect how students are referred for services or focus too much on behavior rather than addressing systemic issues that reinforce stereotypes (Lazarus et al., 2022). There are many

positive outcomes associated with effective MTSS programs, but there is still progress to be made in implementing culturally responsible programming that embodies equity in service delivery.

Interagency Partnerships

Service provision can be limited by the capacity of school personnel, and so interagency partnerships were cited as a key to implementation in 61 articles from this review. Interagency collaboration is a method for facilitating wrap-around services by coordinating services between the school, local mental health agencies, academic institutions, and other organizations to provide an effective continuum of care (Bruns et al., 2016; Duck et al., 2023; Smith-Ramey et al., 2023; Walter et al., 2011). Community partnerships vary in the type of services offered, with some facilitating tier two or tier three support. Interventions and treatment are enhanced through this approach because schools facilitate connections between families in need of care to agencies they would not have otherwise accessed. Collaboration among school-based mental health providers, community mental health providers, and community participants is a key focus of interagency collaborations (Weist et al., 2006). Hess and colleagues (2017) explain that school personnel such as school psychologists and school counselors are key change agents in this model because they collaborate with students, families, and colleagues, and they build community connections, access resources, and advocate for services. Telehealth service is another approach that enhances access to tier three service provision. This approach has increased following the COVID-19 pandemic. Telehealth, as a modality, can decrease barriers schools typically face to facilitating services. It provides greater access to care for underserved youth, it can help with parent engagement since sessions can be conducted at home, and it helps reduce negative stigma associated with therapy (Storey et al., 2023). Within the scope of tier three service provision, these services can bridge the gap between limited school capacity and providing comprehensive care.

Community partnerships are not limited to tier three intervention supports. Another model to enhance community partnerships was proposed by Raviv and colleagues (2022) through the expanded school mental health model. The model encompasses community-academic partnerships and formal community partnerships which support implementation, continuous improvement, model development, training consultation, technical assistance, bridging the research-to-practice gap, and building capacity to sustain practices with fidelity. Within this framework, a behavioral health team uses evidence-based practices like interagency collaboration, data-based decision making, action planning, regular team meetings, regular assessment, quality improvement, and tailored programming for specific population needs. They report that schools utilizing this model showed improvement in facilitating and sustaining an effective behavioral health team, signifying the feasibility, utility, and acceptability of the model in facilitating services. The model is designed to resolve typical barriers to school-based mental health services such as staff capacity, lack of coordination, low focus on tier two and tier three programming, and limited funding, to create a well-functioning team.

Smith-Ramey and colleagues (2023) document the challenges that rural communities face when accessing mental health care services (i.e. provider shortages, transportation challenges, stigma around treatment) and offer an embedded partnership approach using a transdisciplinary mental health team. Their partnership was initiated in 2018 between a public school system and a community behavioral health agency. Through this partnership, they developed a coordinated referral process. It was expanded in 2019 to include two outpatient counselors embedded in the

schools, then expanded again in 2022 to include a clinical supervisor, case manager, family peer recovery specialist, and additional counselor. Results showed that this partnership increased access to mental health services for students in the community. The authors suggest using feedback to drive programming, engaging families, creating goal consensus, utilizing continuous communication at all organizational levels, and leveraging the history of community collaboration (Smith-Ramey et al., 2023).

Kang-Yi et al. (2023) describe the benefits of public-academic partnerships as an avenue for generating actionable evidence for policy, program design, and improving implementation in SBMH delivery. Their evaluation examined the impact of SBMH programs on Medicaid

Table 4
Frequently Cited Keys to Implementation

Implementation Keys	Definition	Frequency
Community engagement	Build on local strengths, involve members of the community (clergy, coaches, relatives) participating in community events (i.e. health fairs, homecoming parades, resource drives).	28
Continuous progress monitoring	Evaluating programs at the group level and individual level to measure progress, utilizing evidence-based assessments.	16
Culturally responsive	Affirm cultural identities, curricula reflective of diversity, positive behavior supports, emphasize students' strengths, an inclusive environment that values diversity.	30
Ecological lens	Used as a theoretical foundation for program development and implementation.	19
Evidence based practices	Assessments, instruments, interventions, and programs that are research based.	18
Family engagement	A partnership between the school, the child and family to identify strengths and problem solve challenges, establish a mutually trusting relationship, actively reducing barriers to engagement.	21
Interagency	Interagency collaboration as a method for facilitating wrap around services by coordinating efforts between the school and local mental health agencies, academic institutions, governmental organizations, clinics, etc.	61
Policy	Identified the need for policy to support funding and implementation of services.	13
Public health	Identified SBMH services as a population-based method for prevention and promotion of emotional well-being for all students.	17
Sustaining funding	The need for diverse funding streams such as federal, state, private foundations, and professional organizations to sustain programming.	19
Universal screening	Providing schoolwide screening for mental health needs.	15

**Note:* when an article mentioned a concept as a key to implementation or recommendation for future studies, it was recorded. There are other keys to implementation and recommendations from articles that are not featured in this table.

expenditures, crisis response centers, psychiatric hospitalizations, children's behavioral health functioning, absences, suspensions, and provider performance. Key findings that support successful partnerships involve aligning expectations and resolving challenges in data collection and analysis examining outcomes to improve processes and disseminating findings.

School-Based Health Centers

School-Based Health Centers (SBHC) are part of the broader public health framework and were utilized in 23 articles from this review (see Table 2). They facilitate access to primary care, behavioral health, vision, dental and other services through partnerships (School-Based Health Alliance, 2023). Bains and Diallo's (2016) systematic review of SBHCs found that over 70% of these clinics provided mental health services, and between 9-30% of all visits were for mental health issues. Students who experienced mental health problems were more likely to use the SBHC and had an average of 6-10 visits each. A large proportion of visits were accounted for by mental health issues and most of those accessing services had no insurance or public insurance. Additionally, students with suicidal ideation were more likely to seek services, with one school reporting 80% of mental health visits related to suicidal ideation and risk.

Duck et al. (2023) offer lessons learned from an interagency partnership that integrated primary and behavioral health care in SBHC's. They cite the importance of sufficient behavioral providers, academic practice partnerships, improving consent to care return rate, and automating data collection processes. They also describe their screening assessment process and provide recommendations for including screening as a practice in SBHC's integrated programming. Partnerships are an important structure for facilitating mental health support because they expand access to care, they encompass a variety of interventionists (Duck et al., 2023; Hess et al., 2017), they offer researchers and providers in training a better understanding of community needs (Kang-Yi et al., 2023), they can be tailored to specific contexts (Capella et al., 2008; Stein et al., 2002), and they provide more diverse streams of funding for sustainability. This interagency approach enhances the network of connections between SBMH providers and community agencies, which in turn connects families to more prevention services. Interagency collaborations and partnerships continue to be cited as key to addressing children and youth mental health problems. See figure 2 for a conceptual framework.

Overall, each model or framework for school-based mental health improves access to and utilization of services for school-aged children (Raviv et al., 2022; Smith-Ramey et al., 2023; Swick & Powers, 2018; Williams & Chapman, 2015). MTSS is a model based within schools and is typically facilitated through school staff at tier one (through universal programming) followed by SBMH providers such as counselors, social workers, and psychologists for tier two and three interventions. However, when a school does not have the capacity to provide tier two and three interventions, they can reach out to community agencies and form partnerships to create a continuum of services for students (Raviv et al., 2022). Interagency partnerships can include community agencies, governmental agencies and academic institutions to improve SBMH services through collaboration, evaluation, funding sustainability, and capacity building (Smith-Ramey et al., 2023). SBHC's offer a broader continuum of care that encompasses primary care as well as behavioral and mental health care. Each model differs in the range of services provided; however, all utilize a public health approach to meet the mental health needs of students. SBMH programs vary widely depending on factors like funding, policies, and provider availability. Thus, each

model varies in terms of improving access to effective treatment and care; this is especially true depending on how well interventions are tailored to meet the specific needs of the community.

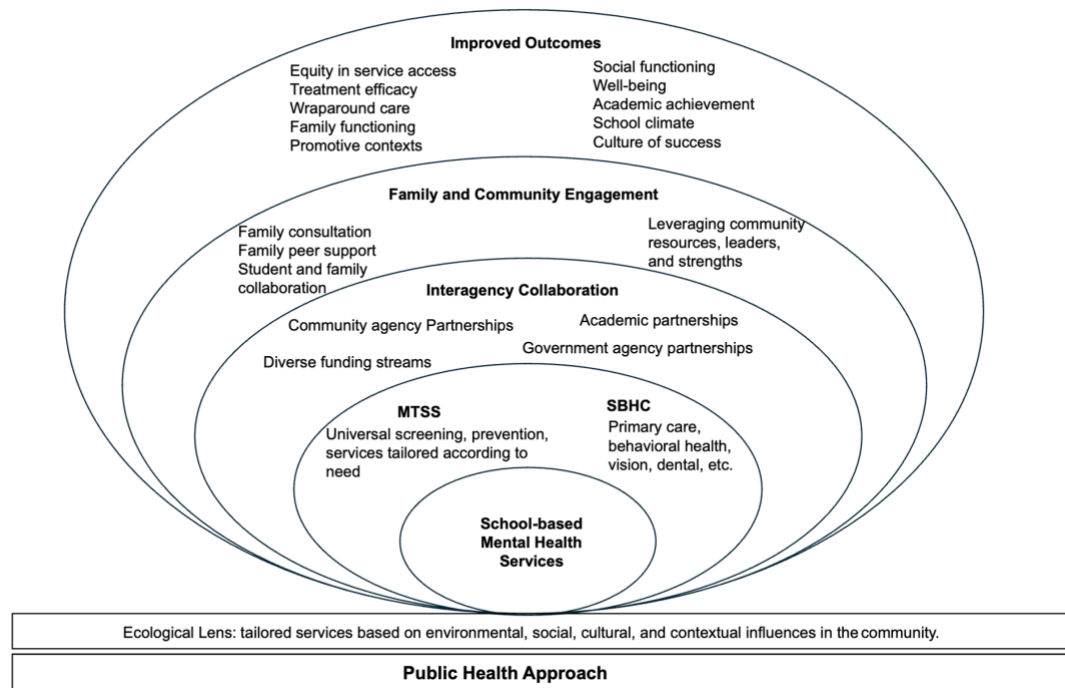


Figure 2. Improving Equity and Access to Mental Health Care for Youth

Note. MTSS is abbreviated for Multitiered System of Support. SBHC is abbreviated for School-based Health Center.

Cultural and Contextual Considerations

Cultural and contextual considerations were cited in 30 different articles as critical for program selection, implementation, engagement, efficacy, and sustainability. Within the literature on SBMH models of care, many publications explore specific populations such as immigrant children, Black adolescent males, students with disabilities, or LGBTQ+ youth (see Table 3). The majority examine SBMH provision within the context of high poverty communities which is likely due to the intersectional nature of poverty, race, mental health (i.e., social determinants), and the ability to access care.

Specific Populations

Culturally and contextually responsive services directly influence help-seeking and service utilization (Guo et al., 2015). These types of services are crucial for student populations such as students with disabilities, BIPOC, LGBTQ+, immigrant, and economically disadvantaged students. Policy changes and funding initiatives are still playing catch-up in terms of the mental

health needs for specific populations. Several studies provide evidence of the effectiveness of tailored or targeted mental health interventions for lowering suicide risk and the psychological effects of post-traumatic stress disorder that are prevalent among youth from vulnerable populations (i.e., immigrant youth, LGBTQ+ youth) (Ross et al., 2020), while also reducing stigma and improving help-seeking for Asian immigrant youth and Black adolescent males (Guo et al., 2014; Williams et al., 2023). However, there continue to be gaps in SBMH provision for students with disabilities (Skaar et al., 2021). Disparities in SBMH provision in rural areas and high poverty schools is an ongoing challenge (Moore et al., 2023). Moreover, chronic poverty can increase exposure to violence, crime, and residential instability, all of which contribute to chronic stress (Bains & Diallo, 2016). Thus, these specific populations are at a higher risk for mental health issues, yet they face additional challenges in receiving care (i.e. cost, insurance, transportation, etc.).

Culturally Responsive Services

Evidence suggests there is a strong cultural influence on mental health care utilization (Castro-Olivo, 2017; Planey et al., 2019). For many individuals from diverse demographic groups, there is a high degree of stigma associated with mental health problems which is in turn associated with a lower likelihood of help-seeking and service utilization. There is also mistrust based on historically negative experiences with medicine and mental health care services (Planey et al., 2019). Key elements to culturally responsive school-based mental health practices in differing contexts include leveraging home support, tailoring interventions to community needs, creating partnerships with community participants, capitalizing on community strengths and resources, and offering culturally responsive supports (Edyburn et al., 2021). Furthermore, professional development and preservice teacher programs that prepare educators to be responsive to different populations are also cited as key to promoting equitable practices (Edyburn et al., 2021; Moore et al., 2023; Sailor et al., 2021).

When school-based mental health services are not culturally responsive or tailored to population needs, it can have an adverse effect and negatively impact students. Thus, when considering effective service delivery models, an ecological perspective is highlighted as an approach to understanding the cultural context for school-based supports (Farahmand et al., 2011; Hoagwood et al., 2007; Michael & Jameson, 2017; Rojas-Andrade & Bahamondes, 2019; Sanchez et al., 2018).

DeBoer and colleagues (2020) discuss the importance of incorporating culture into the conceptualization of universal mental health practices in schools and the associated challenges. They emphasize the need for school systems to be aware of systemic racism and use practices such as MTSS as proactive frameworks to address both externalizing and internalizing behaviors that are often mischaracterized as behavior problems, especially for minoritized youth. Lazarus and colleagues (2022) highlight the importance of culturally responsive school-based mental health practices by considering the ways in which racism and inequality permeate aspects of public education in the U.S. This plays out in white, male-centric norms, policies, and expectations that often lead to exclusionary or zero-tolerance discipline that, in turn, have negative effects on BIPOC student well-being. They argue that disparities in mental health provision for racially minoritized students can be reduced through school-based delivery by improving access to care, reducing stigma, and – more importantly – focusing on positive, strengths-based, and culturally appropriate approaches.

Lazarus and colleagues (2022) advocate for a dual factor model of mental health service provision in schools. In this model emphasis is placed on well-being, cultural strengths of minoritized communities, systemic structures that contribute to disparities, the importance of cultural responsibility, accessibility of services for all students, and a population-based approach. They argue that school psychological services ignore subjective well-being when considering mental health, which can range in presentation. The traditional model emphasizes services that are deficit focused, are provided to students with disabilities and disorders, and are based on a single factor model of mental health (Lazarus et al., 2022). In their proposed Culturally Responsible Dual-Factor Model, mental health is viewed through a cultural lens that acknowledges the context of inequity and systemic racism. It focuses on cultural attributes of the community and ecologies (Lazarus et al., 2022).

Poverty

Communities in poverty were the population of focus in 23 articles from this review. SBMH services are particularly important for communities in poverty and can be modified based on ecological and public health principles that are tailored to specific community needs. Capella and colleagues (2008) call for an approach that uses an ecological model to integrate mental health programs into specific contexts, such as high poverty communities. They explain that leveraging support from home, the community, and the school can better meet the needs of students within these contexts. Doll and colleagues (2017) emphasize a collaborative approach that supports team planning, implementation, and data-based decision-making. This approach engages school personnel and community agencies, fostering partnerships that are responsive to the cultural and ecological contexts of the school while leveraging existing strengths and resources within the community.

Atkins and colleagues (2006) describe an approach for serving high-poverty urban communities that emphasizes the importance of accessibility, effectiveness, and sustainability of services. More specifically, for accessibility, they explain the need to actively engage families through extensive outreach, to reduce barriers to involvement, and collaborate with community members in the recruitment process. Through the lens of ecological systems, school-based mental health services can strengthen connections between agencies, create new partnerships, and promote synergistic collaborations that are tailored to community needs and promote access to mental health care through these networks (Holt & Grills, 2015).

Overall, findings suggest that any school-based mental health service framework, model, or intervention must account for culture and context by addressing serious barriers to access such as poverty, acculturation, language differences, and family structure and that an ecological model is an effective framework for implementing culturally responsive services.

Outcomes

There is a dearth of publications reporting outcomes associated with school-based mental health services. This suggests that there is a considerable gap between school-based mental health as a concept and the evidentiary base in support of school-based mental health services in practice. However, the extant findings do indicate that school-based mental health services are effective at improving access to care for diverse populations, improving symptoms of specific mental health disorders, lowering suicide risk, and bolstering academic success.

Utilization of Services

Several studies provide strong evidence of the effectiveness of school-based mental health care for improving access and utilization of services (Hodges, 2021; Stempel et al., 2019; Stuenkel et al., 2023). A common theme emerged suggesting that school-based services dramatically increase access and help-seeking, especially for students living in underserved communities, and these results are attributed to the ways in which SBMH services and SBHCs reduce cost and transportation barriers. Two reviews (Bains & Diallo, 2016; Werlen et al., 2020) and one process evaluation (Ambrose et al., 2013) found that school-based mental health services improve accessibility to mental health care and that most K-12 students reported they would not otherwise seek services outside of the school. Adolescents reported they were 21 times more likely to use SBHCs for mental health care services versus community-based clinics reporting that they valued the services because they were accessible and trusted the providers (Bains & Diallo, 2016). Adolescents who had suicidal ideation were more likely to have seen a therapist through the clinics and, in one clinic, 80% of the visits were comprised of students who had suicidal ideation (Bains & Diallo, 2016).

Mental Health Disorders

The Arora et al. (2019) systematic review of MTSS based depression interventions found 57 programs among 119 studies that showed tier one interventions had a 76.7% efficacy rate, with effect sizes ranging from small to very large, tier two interventions were identified as 77.5% effective with similar effect sizes, and lastly tier three interventions were 78.9% effective with similar effect sizes as well. Age was found to be a predictor of efficacy with participants that were older than thirteen showing better response to the intervention.

Beehler and colleagues (2012) conducted a collaborative study of Cultural Adjustment and Trauma Services (CATS), a comprehensive, school-based mental health program for traumatized immigrant children and adolescents. This program was an interagency collaboration between a community agency and a local school district, with funding put forth by the Substance Abuse and Mental Health Services Administration. Program effectiveness was assessed by testing whether client functioning, and post-traumatic stress disorder (PTSD) symptoms improved as a result of seven separate service elements. Results indicated greater quantities of cognitive-behavior therapy and supportive therapy increased functioning, while greater quantities of coordinating services decreased symptoms of PTSD. Similarly, Werner-Seidler and colleagues' (2017) review and metaanalysis demonstrated the effectiveness of school-based mental health prevention programs at improving symptoms of depression and anxiety in children and adolescents.

Academic Achievement

In a study of a school-based mental health program grounded in a systems of care framework, students demonstrated significant improvements in both math and literacy scores over the course of the school year, with average scores increasing each quarter (Swick & Powers, 2018). Students in the sample were considered at-risk due to their mental health needs. The program also demonstrated significant benefits for students classified as exceptional, who showed gains in math and literacy over the school year. Together, these outcomes suggest that school-based mental

health services that utilize an ecological framework, promote students' academic success, emphasize early interventions, and strengthen students' psychological wellness. Such services minimize school, community, and family adversity and maximize protective factors. They attend to school and classroom ecologies that maximize students' engagement in classroom learning (Gruber et al., 2023; Kang-Yi et al., 2013; Kronsberg & Bettencourt, 2020; Walker et al., 2010).

Other studies focused on the effects of specific diagnoses or treatment modalities within SBMH frameworks. Findings suggest that targeted, or tier two interventions are generally effective at improving symptoms of depression and anxiety and reducing suicide risk among adolescents (Paschall & Bersamin, 2018; Zhang et al., 2023). In addition to reducing aggression and violence victimization in middle school (Morgan-Lopez et al., 2020). A handful of other studies and program evaluations of SBMH services also suggest good evidence of its effectiveness to support student retention, improve attendance, reduce academic and behavioral referrals, and improve reading outcomes (Gruber et al., 2023; Walker et al., 2010; Wegman et al., 2017; Whitaker et al., 2018). Sanchez and colleagues (2018) conducted a meta-analysis of the effectiveness of school-based mental health services for elementary aged children and found that, overall, school-based services demonstrated a small-to-medium effect in decreasing mental health problems with the largest effects found for targeted intervention. Strong effects were found for mental health services integrated into classroom instruction, those targeting externalizing problems, those incorporating contingency management, and those implemented multiple times per week.

Positive outcomes in effective MTSS models were facilitated through programs like the Comprehensive Behavioral Health Model (Battal, 2020), the Multitiered System of Mental Health Support (Hoover & Bostic, 2021), and the Comprehensive School Mental Health system (Hoover et al., 2019). Results from a study on the Comprehensive Behavioral Health Model showed that at risk students such as those with internalizing behaviors and a demonstrated level of risk had improved outcomes (Battal, 2020). Other data from the Multitiered System of Mental Health Support showed improved psychosocial functioning, improved academics, and a reduction in outcomes like school failure and mental illness (Hoover & Bostic, 2021). Hoover and colleagues (2019) reported on nationwide SBMH provision best practices. They found effective programs showed improvements in attendance, academic success, school climate, school safety, social and emotional behavioral functioning, and a reduction in exclusionary discipline practices. Other studies demonstrated the effectiveness of school-based mental health services in reducing aggression and violence in middle schoolers (Morgan-Lopez et al., 2020) and improving student attendance (Gruber et al., 2023). However, Hoagwood and colleagues' (2007) review emphasizes the dearth of school-based mental health outcome research and the ongoing need to assess educational outcomes associated with such services.

Barriers

Barriers and facilitators to implementation were documented as part of many research studies seeking to expand and enhance school-based mental health services (Atkins et al., 2003; Ambrose et al., 2013; Borntrager & Lyon, 2015; Doll et al., 2017; Langley et al., 2010; Powers et al., 2013; Swick & Powers, 2018; Weist & Christodulu, 2000). Challenges remain in implementing SBMH services. Stigma surrounding mental health as well as a distrust of mental health professionals from historically marginalized groups persists. It is important to engage in positive relationships with families to enable trust and work towards the specific needs of each student. Ensuring privacy is a key component to maintaining trust and protecting sensitive student information. Continuous

and transparent progress monitoring help all involved parties understand student needs and work towards a shared goal. Moving forward, graduate training programs that embody cultural humility, community engagement, and a dual-factor model of mental health are recommended to meet the disparities that exist within communities across the country. Disparities in the implementation of SBMH support acutely impact mid-high poverty schools, rural schools, and elementary schools. Training school staff to effectively identify and intervene with students experiencing behavioral health problems is a continued challenge. Promoting mental health awareness through teacher training and school programming reduces stigma as well as punitive punishment measures, while supporting and improving school climate. Creating a supportive community network within the school and between the community is an important way to build trust and raise awareness about mental health.

Workforce shortages are a continued issue that result in less access to SBMH care services, thus building staff capacity is an avenue for ensuring provision. Building staff capacity includes creating sustainable funding streams for continued SBMH provider employment. It also involves adhering to the most effective roles and functions of providers. When providers are tasked with non-mental health related duties, staff capacity for addressing mental health issues is diminished. Working to coordinate and align the expertise of different SBMH providers is essential for optimizing service provision. When internal staff capacity needs are not met, schools can partner with local community agencies, academic institutions, or local government institutions to maintain a continuum of support for families. Academic partnerships offer service-learning opportunities for students in training, continuous evaluation and progress monitoring, implementation of evidence-based practices while facilitating systemic initiatives that promote health in the schools and communities.

Discussion

Summary of Findings

Three consistent themes emerged from this review: the variety of ways SBMH services are implemented, the importance of cultural and contextual considerations within the models, and limited findings from research on school-based mental health outcomes. The criticality of cultural and contextual factors within interventions is especially noteworthy. Contextual factors like high poverty account for different stressors like exposure to community violence, high teacher turnover, food instability, employment instability, and housing instability. Thus, school-based mental health interventions and services need to be tailored to environments the students are navigating. Rural communities continue to face barriers to mental health care due to provider shortages and stigma associated with mental illness, and school-based services are often the only point of access for these families (Smith-Ramey et al., 2023). The needs of specific cultural groups such as immigrant and BIPOC students also appeared in multiple articles, explaining the unique acculturative stressors that they face (Gaias et al., 2022; Planey et al., 2019; Stein et al., 2002). Mental health supports for immigrant children and other ethnic minority groups are crucial for promoting bicultural adjustment and attachment in host schools; and, in alignment with an ecological perspective, factors within the school can positively shape the formation of self-esteem, personality, adaptive coping mechanisms, and ultimately mental health (Gonzalez-Ramos & Gonzalez, 2013).

Strategies for implementing SBMH programs can create equity and promote a broader reach. For example, implementation strategies can be tailored to the context which can enhance equity, improve the fit of the intervention in the context, and reduce outcome disparities (Gaías et al., 2022). Interagency partnerships are key for facilitating SBMH services. They can be tailored to need and effectively provide a continuum of services for students, they enable authentic practicum experiences for master's and doctoral level SBMH providers in training (Doll et al., 2017; Eklund et al., 2013; Storey et al., 2023), and they are an important avenue to diversify funding streams that sustain programs (Choi et al., 2022; Heinrich et al., 2023; Kang-Yi et al. 2023; Skaar et al., 2021).

Lastly, this review highlights strong but limited evidence of the effectiveness of school-based mental health services at supporting important student outcomes. This includes studies exploring the effects of school-based mental health interventions on outcomes ranging from suicide risk to reading and literacy (Hoagwood et al., 2007; Walker et al., 2010; Wegmann et al., 2017). Such outcomes are crucial, not only for the lives of those impacted by the need for mental health care access, but for building the evidentiary base for school-based services. Research that measures specific outcomes is crucial for driving data-based decision making and implementing best practices that are evidence-based.

Policy Implications for School-Based Mental Health Programs

Given that schools serve as a primary context for prevention and early intervention, policy frameworks must prioritize equitable access, interprofessional collaboration, and long-term funding to strengthen the mental health infrastructure within educational settings.

Integrating Mental Health into Educational Policy

A central policy implication involves embedding mental health into the broader educational accountability framework. Federal legislation such as the Every Student Succeeds Act (ESSA, 2015) emphasizes academic outcomes but offers limited explicit guidance regarding social-emotional and mental health supports. Policymakers could strengthen ESSA implementation by requiring states to include school climate and mental health indicators in accountability systems, thereby incentivizing local education agencies to invest in evidence-based SBMH initiatives (Perkins, 2025). Additionally, integration with the Individuals with Disabilities Education Act (IDEA, 1975) and Section 504 of the Rehabilitation Act (1973) can ensure that students with neurodevelopmental disabilities and emotional and behavioral challenges receive appropriate accommodations and services.

Funding and Sustainability

Sustainable funding remains one of the most significant barriers to effective SBMH implementation. Although short-term grants from federal or philanthropic sources (e.g., Project AWARE, SAMHSA) have expanded mental health services in some districts, these programs often lack mechanisms for long-term sustainability (Green et al., 2013). Policy reform should include dedicated federal and state funding streams for comprehensive mental health programs, comparable to those supporting academic interventions. Embedding mental health expenditures

within state education budgets or Medicaid reimbursement systems would enhance stability and reduce inequities across districts, particularly those serving high-poverty and rural populations.

Workforce Development and Interprofessional Collaboration

Policy action is also required to address workforce shortages and improve interdisciplinary collaboration. Many schools operate with counselor-to-student ratios far exceeding the American School Counselor Association's (ASCA, 2025) recommended 250:1 ratio. Federal and state initiatives could incentivize the recruitment and retention of qualified school counselors, psychologists, and social workers through tuition assistance, loan forgiveness, and residency programs. Furthermore, policies promoting integrated service delivery—linking schools with community-based mental health providers—would foster continuity of care and mitigate service fragmentation (Weist et al., 2020).

Equity and Access Considerations

Equity must be central to SBMH policy development. Students of color, those living in poverty, and those in rural or under-resourced districts disproportionately lack access to culturally responsive and linguistically appropriate services (Castro-Olivo, 2017). Policies should require the use of culturally informed assessment tools, family engagement strategies, and staff training in anti-racist and trauma-informed practices. Additionally, funding formulas could be revised to prioritize schools serving historically marginalized populations to ensure equitable mental health support across communities.

Evaluation

Finally, policy frameworks must include mechanisms for ongoing evaluation and accountability. States and districts should be required to collect and report data on student mental health outcomes, service utilization, and program effectiveness, disaggregated by demographic variables. Such data systems would enable continuous improvement, support transparency, and ensure that investments in mental health yield measurable outcomes for student well-being and learning (Bohnenkamp et al., 2023).

Implications for International Contexts

Although this review focused on school-based mental health (SBMH) implementation within the United States, the findings have several important implications for international contexts. Across countries, schools represent one of the most accessible and equitable settings for delivering mental health supports to children and adolescents, particularly in regions where community mental health infrastructure is limited (Margaretha et al., 2023). The variation in implementation approaches identified in this review suggests that SBMH models may be most effective when they are adapted to align with local educational systems, cultural norms regarding mental health, and available workforce capacity.

International applications should consider how cultural beliefs about mental health, help-seeking behaviors, family involvement, and stigma may influence service utilization and effectiveness. Programs developed in U.S. contexts may require adaptation to reflect local

languages, culturally grounded understandings of wellbeing, and community priorities. This is particularly important in low- and middle-income countries, where westernized mental health frameworks may not fully align with indigenous or community-based conceptualizations of wellness.

The review also underscores the importance of flexible service delivery models. The three primary approaches identified in the literature suggest that there is no single “best” model; rather, effectiveness depends on how well services fit within existing school structures and resources. In international settings, this may involve task-shifting approaches (e.g., training teachers or paraprofessionals to provide Tier 1 and Tier 2 supports), partnerships with community organizations, or integration with public health initiatives. Such flexibility may be especially important in countries facing shortages of trained school psychologists or counselors.

Third, the implementation factors identified in this review, including interdisciplinary collaboration, leadership support, sustainable funding, and ongoing professional development, appear highly transferable to international SBMH efforts. However, policymakers and practitioners outside the U.S. may need to consider how differences in governance structures, funding mechanisms, and educational policy environments affect feasibility. For example, countries with centralized education systems may be able to scale SBMH more rapidly through national policy initiatives, whereas decentralized systems may require more localized implementation strategies.

Finally, this review points to the need for more cross-national SBMH research to better understand how implementation strategies function across diverse sociocultural and economic contexts. Future research would benefit from comparative international studies that examine how similar SBMH frameworks are adapted across countries, as well as research emerging from the Global South, which remains underrepresented in the literature. Such work could contribute to the development of more globally relevant implementation frameworks and promote bidirectional learning between U.S. and international SBMH efforts.

Limitations

Several limitations should be considered when interpreting the findings of this review. First, the inclusion criteria limited articles to those published in the United States, which may restrict the generalizability of findings to international contexts or educational systems with different policy, funding, and service delivery structures. Second, as an integrative review of existing literature, the findings are dependent on the methodological quality and reporting practices of the included studies, which varied considerably in design, implementation detail, and outcome measurement. This variability may limit the ability to draw definitive conclusions about the comparative effectiveness of specific SBMH models. Additionally, publication bias may be present, as studies reporting positive outcomes or successful implementation efforts are more likely to be published than those describing null findings or implementation challenges. Finally, although efforts were made to systematically categorize implementation approaches and key factors, differences in terminology and conceptual definitions across disciplines may have resulted in some overlap or ambiguity in how models and strategies were classified. Future research using more standardized implementation frameworks and reporting guidelines would strengthen the comparability of SBMH research.

Conclusion

In summary, advancing equitable, sustainable school-based mental health systems requires a coordinated policy approach that integrates funding, workforce development, equity, and accountability. By embedding mental health within the educational policy infrastructure, federal and state agencies can ensure that all students have access to the supports necessary for both academic success and psychological well-being.

ORCID ID

Katrina A. Jean  <https://orcid.org/0009-0006-5101-1289>

Lia D. Falco  <https://orcid.org/0000-0003-1185-1348>

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References

- Ambrose, M. G., Weist, M. D., Schaeffer, C., Nabors, L. A., & Hill, S. (2013). Evaluation and quality improvement in school mental health. In *Providing Mental Health Services to Youth Where They Are* (pp. 95-110). Routledge.
- American School Counselor Association. (2025). *The ASCA national model: A framework for school counseling programs* (5th ed.). Author.
- Arora, P. G., Collins, T. A., Dart, E. H., Hernández, S., Fetterman, H., & Doll, B. (2019). Multi-tiered systems of support for school-based mental health: A systematic review of depression interventions. *School Mental Health, 11*(2), 240-264. <https://doi.org/10.1007/s12310-019-09314-4>
- Atkins, M. S., Graczyk, P. A., Frazier, S. L., & Abdul-Adil, J. (2003). Toward a new model for promoting urban children's mental health: Accessible, effective, and sustainable school-based mental health services. *School Psychology Review, 32*(4), 503-514. <https://doi.org/10.1080/02796015.2003.12086214>
- Atkins, M. S., Hoagwood, K. E., Kutash, K., & Seidman, E. (2010). Toward the integration of education and mental health in schools. *Administration and Policy in Mental Health and Mental Health Services Research, 37*, 40-47. <https://doi.org/10.1007/s10488-010-0299-7>
- Bains, R. M., Cusson, R., White-Frese, J., & Walsh, S. (2017). Utilization of mental health services in school-based health centers. *Journal of School Health, 87*(8), 584-592. <https://doi.org/10.1111/josh.12528>
- Bains, R. M., & Diallo, A. F. (2016). Mental health services in school-based health centers: Systematic review. *The Journal of School Nursing, 32*(1), 8-19. <https://doi.org/10.1177/1059840515590607>
- Battal, J., Pearrow, M. M., & Kaye, A. J. (2020). Implementing a comprehensive behavioral health model for social, emotional, and behavioral development in an urban district: An

- applied study. *Psychology in the Schools*, 57(9), 1475-1491.
<https://doi.org/10.1002/pits.22420>
- Beehler, S., Birman, D., & Campbell, R. (2012). The effectiveness of cultural adjustment and trauma services (CATS): Generating practice-based evidence on a comprehensive, school-based mental health intervention for immigrant youth. *American Journal of Community Psychology*, 50, 155-168. <https://doi.org/10.1007/s10464-011-9486-2>
- Bohnenkamp, J. H., Patel, C., Connors, E., Orenstein, S., Ereshefsky, S., Lever, N., & Hoover, S. (2023). Evaluating strategies to promote effective, multidisciplinary team collaboration in school mental health. *Journal of Applied School Psychology*, 39(2), 130-150.
<https://doi.org/10.1080/15377903.2022.2077875>
- Borntrager, C., & Lyon, A. R. (2015). Client progress monitoring and feedback in school-based mental health. *Cognitive and Behavioral Practice*, 22(1), 74-86.
<https://psycnet.apa.org/doi/10.1016/j.cbpra.2014.03.007>
- Boustani, M. M., Frazier, S. L., Becker, K. D., Bechor, M., Dinizulu, S. M., Hedemann, E. R., Ogle, R. R., & Pasalich, D. S. (2015). Common elements of adolescent prevention programs: minimizing burden while maximizing reach. *Administration and Policy in Mental Health and Mental Health Services Research*, 42, 209-219.
<https://doi.org/10.1007/s10488-014-0541-9>
- Bruns, E. J., Duong, M. T., Lyon, A. R., Pullmann, M. D., Cook, C. R., Cheney, D., & McCauley, E. (2016). Fostering SMART partnerships to develop an effective continuum of behavioral health services and supports in schools. *American Journal of Orthopsychiatry*, 86(2), 156. <https://doi.org/10.1037/ort0000083>
- Castro-Olivo, S. M. (2017). Introduction to special issue: Culturally responsive school-based mental health interventions. *Contemporary School Psychology*, 21, 177-180.
<https://doi.org/10.1007/s40688-017-0137-y>
- Child and Adolescent Health Measurement Initiative (2023). 2022-2023 National Survey of Children's Health (NSCH) data query. Data Resource Center for Child and Adolescent Health supported by the U.S. Department of Health and Human Services, Health Resources and Services Administration (HRSA), Maternal and Child Health Bureau (MCHB). Retrieved October 12, 2025, from www.childhealthdata.org
- Choi, J. H., McCart, A. B., Miller, D. H., & Sailor, W. (2022). Issues in statewide scale up of a multi-tiered system of support. *Journal of School Leadership*, 32(5), 514-536.
<https://doi.org/10.1177/10526846211067650>
- Connors, E. H., Moffa, K., Carter, T., Crocker, J., Bohnenkamp, J. H., Lever, N. A., & Hoover, S. A. (2022). Advancing mental health screening in schools: Innovative, field-tested practices and observed trends during a 15-month learning collaborative. *Psychology in the Schools*, 59(6), 1135-1157. <https://doi.org/10.1002/pits.22670>
- Cronin, M. A., & George, E. (2020). The why and how of the integrative review. *Organizational Research Methods*, 26(1), 168-192. <https://doi.org/10.1177/1094428120935507>
- DeBoer, J. L., Allouche, S. F., Vasquez, J. I., & Rhodes, J. (2022). Equitable practices in school mental health. *Psychology in the Schools*, 59(6), 1222-1238.
<https://psycnet.apa.org/doi/10.1002/pits.22678>
- Doll, B., Nastasi, B. K., Cornell, L., & Song, S. Y. (2017). School-based mental health services: Definitions and models of effective practice. *Journal of Applied School Psychology*, 33(3), 179-194. <https://doi.org/10.1080/15377903.2017.1317143>

- Dowdy, E., Ritchey, K., & Kamphaus, R. W. (2010). School-based screening: A population-based approach to inform and monitor children's mental health needs. *School Mental Health, 2*(4), 166-176. <https://doi.org/10.1007/s12310-010-9036-3>
- Dowdy, E., Furlong, M., Raines, T. C., Boverly, B., Kauffman, B., Kamphaus, R. W., Dever, B. V., Price, M., & Murdock, J. (2015). Enhancing school-based mental health services with a preventive and promotive approach to universal screening for complete mental health. *Journal of Educational and Psychological Consultation, 25*(2-3), 178-197. <https://doi.org/10.1080/10474412.2014.929951>
- Duck, A. A., Carr, K., Lim, C. S., & Robinson, J. C. (2023). Integrating behavioral health and primary care in an inner-city high school: Expanded care in a school-based clinic in Mississippi, 2018-2020. *Public Health Reports, 138*(1), 16S-21S. <https://doi.org/10.1177/00333549221128221>
- Edyburn, K. L., Bertone, A., Raines, T. C., Hinton, T., Twyford, J., & Dowdy, E. (2021). Integrating intersectionality, social determinants of health, and healing: A new training framework for school-based mental health. *School Psychology Review, 1*-23. <https://doi.org/10.1080/2372966X.2021.2024767>
- Farahmand, F. K., Grant, K. E., Polo, A. J., & Duffy, S. N. (2011). School-based mental health and behavioral programs for low-income, urban youth: A systematic and meta-analytic review. *Clinical Psychology, 18*(4), 372-390. <https://doi.org/10.1111/j.1468-2850.2011.01265.x>
- Frey, A. J., Mitchell, B. D., Kelly, M. S., McNally, S., & Tillett, K. (2022). School-based mental health practitioners: A resource guide for educational leaders. *School Mental Health, 14*(4), 789-801. <https://doi.org/10.1007/s12310-022-09530-5>
- Friedrich, A. A., Mendez, L. M. R., & Mihalas, S. T. (2010). Gender as a factor in school-based mental health service delivery. *School Psychology Review, 39*(1), 122-136. <https://doi.org/10.1080/02796015.2010.12087794>
- Gaias, L. M., Arnold, K. T., Liu, F. F., Pullmann, M. D., Duong, M. T., & Lyon, A. R. (2022). Adapting strategies to promote implementation reach and equity (ASPIRE) in school mental health services. *Psychology in the Schools, 59*(12), 2471-2485. <https://doi.org/10.1002/pits.22515>
- González-Ramos, G., & González, M. J. (2013). Mental health care of Hispanic immigrant children: A school-based approach. In *Mental Health Care for New Hispanic Immigrants* (pp. 47-58). Routledge. https://doi.org/10.1300/J191v03n01_03
- Graaf, G., Baiden, P., Keyes, L., & Boyd, G. (2022). Barriers to mental health services for parents and siblings of children with special health care needs. *Journal of Child and Family Studies, 31*(3), 881-895. <https://doi.org/10.1007/s10826-022-02228-x>
- Green, J. G., McLaughlin, K. A., Alegria, M., Costello, E. J., Gruber, M. J., Hoagwood, K., & Kessler, R. C. (2013). School mental health resources and adolescent mental health service use. *Journal of the American Academy of Child & Adolescent Psychiatry, 52*(5), 501-510. <https://doi.org/10.1016/j.jaac.2013.03.002>
- Gruber, J. A., Anderson-Carpenter, K. D., McNall, M., & Clark, S. L. (2023). Understanding the longitudinal impact of school-based health centers on student attendance. *Child & Youth Care Forum, 52*(2), 331-350. <https://doi.org/10.1007/s10566-022-09691-z>
- Guo, S., Nguyen, H., Weiss, B., Ngo, V. K., & Lau, A. S. (2015). Linkages between mental health need and help-seeking behavior among adolescents: Moderating role of ethnicity

- and cultural values. *Journal of Counseling Psychology*, 62(4), 682-693.
<https://doi.org/10.1037/cou0000094>
- Hess, R. S., Pearrow, M., Hazel, C. E., Sander, J. B., & Wille, A. M. (2017). Enhancing the behavioral and mental health services within school-based contexts. *Journal of Applied School Psychology*, 33(3), 214-232. <https://doi.org/10.1080/15377903.2017.1317151>
- Heinrich, C. J., Colomer, A., & Hieronimus, M. (2023). Minding the gap: Evidence, implementation and funding gaps in mental health services delivery for school-aged children. *Children and youth services review*, 150, 107023.
<https://doi.org/10.1016/j.childyouth.2023.107023>
- Hoagwood, K. E., Serene Olin, S., Kerker, B. D., Kratochwill, T. R., Crowe, M., & Saka, N. (2007). Empirically based school interventions targeted at academic and mental health functioning. *Journal of Emotional and Behavioral Disorders*, 15(2), 66-92.
<https://doi.org/10.1177/10634266070150020301>
- Hodges, M. M., Guendelman, S., & Soleimanpour, S. (2021). Adolescents' use of school-based health centers and receipt of mental health supports. *Children and Youth Services Review*, 120, 105700. <https://doi.org/10.1016/j.childyouth.2020.105700>
- Hodgkinson, S., Godoy, L., Beers, L. S., & Lewin, A. (2017). Improving mental health access for low-income children and families in the primary care setting. *Pediatrics*, 139(1), 1-9. <https://doi.org/10.1542/peds.2015-1175>
- Holt, M. K., & Grills, A. E. (2015). *Critical issues in school-based mental health*. Routledge.
- Hoover, S., & Bostic, J. (2021). Schools as a vital component of the child and adolescent mental health system. *Psychiatric Services*, 72(1), 37-48.
<https://doi.org/10.1176/appi.ps.201900575>
- Hoover, S. A., Lever, N. A., Sachdev, N., Bravo, N., Schlitt, J. J., Price, O. A., & Cashman, J. (2019). *Advancing comprehensive school mental health systems: Guidance from the Field*. National Center for School Mental Health, University of Maryland School of Medicine.
- Huff, A. S. (2009). *Designing Research for Publication*. Sage.
- Jimerson, S. R., Burns, M. K., & VanDerHeyden, A. M. (Eds.). (2016). *Handbook of response to intervention: The science and practice of multi-tiered systems of support* (pp. 1-6). Springer. <https://doi.org/10.1007/978-1-4899-7568-3>
- Kang-Yi, C. D., Mandell, D. S., & Hadley, T. (2013). School-based mental health program evaluation: Children's school outcomes and acute mental health service use. *Journal of School Health*, 83(7), 463-472. <https://doi.org/10.1111/josh.12053>
- Kang-Yi, C. D., Kuriyan, A., Kinkler, G., Piscella, A. E., Williams, T., & Wolk, C. B. (2023). Generating actionable evidence for school-based mental health service delivery: public-academic partnership based evaluations. *Community Mental Health Journal*, 1-13.
<https://doi.org/10.1007/s10597-023-01147-5>
- Kase, C., Hoover, S., Boyd, G., West, K. D., Dubenitz, J., Trivedi, P. A., Stein, B. D. (2017). Educational outcomes associated with school behavioral health interventions: A review of the literature. *The Journal of School Health*, 87(7), 554-562.
<https://doi.org/10.1111/josh.12524>
- Kern, L., Mathur, S. R., Albrecht, S. F., Poland, S., Rozalski, M., & Skiba, R. J. (2017). The need for school-based mental health services and recommendations for implementation. *School Mental Health*, 9, 205-217. <https://doi.org/10.1007/s12310-017-9216-5>

- Kern, L., Weist, M. D., Mathur, S. R., & Barber, B. R. (2022). Empowering school staff to implement effective school mental health services. *Behavioral disorders*, 47(3), 207-219. <https://doi.org/10.1177/01987429211030860>
- Kronsberg, H., Bettencourt, A. F., Vidal, C., & Platt, R. E. (2020). Education on the social determinants of mental health in child and adolescent psychiatry fellowships. *Academic Psychiatry*, 1-5. <https://doi.org/10.1007/s40596-020-01269-y>
- Langley, A. K., Nadeem, E., Kataoka, S. H., Stein, B. D., & Jaycox, L. H. (2010). Evidence-based mental health programs in schools: Barriers and facilitators of successful implementation. *School Mental Health*, 2, 105-113. <https://doi.org/10.1007/s12310-010-9038-1>
- Lazarus, P. J., Doll, B., Song, S. Y., & Radliff, K. (2022). Transforming school mental health services based on a culturally responsible dual-factor model. *School Psychology Review*, 51(6), 755-770. <https://doi.org/10.1080/2372966X.2021.1968282>
- Ma, K. K. Y., Anderson, J. K., & Burn, A. M. (2023). School-based interventions to improve mental health literacy and reduce mental health stigma: A systematic review. *Child and Adolescent Mental Health*, 28(2), 230-240. <https://doi.org/10.1111/camh.12543>
- Maag, J. W., & Katsiyannis, A. (2010). School-based mental health services: Funding options and issues. *Journal of Disability Policy Studies*, 21(3), 173-180. <https://psycnet.apa.org/doi/10.1177/1044207310385551>
- Margaretha, M., Azzopardi, P. S., Fisher, J., & Sawyer, S. M. (2023). School-based mental health promotion: A global policy review. *Frontiers in Psychiatry*, 14, 1126767. <https://doi.org/10.3389/fpsy.2023.1126767>
- Merianos, A. L., Vidourek, R. A., & King, K. A. (2017). Effective prevention strategies for increasing health services utilization among Hispanic youth. *Community Mental Health Journal*, 53, 79-91. <https://doi.org/10.1007/s10597-016-0022-6>
- Michael, K. D., & Jameson, J. P. (2017). *Handbook of rural school mental health*. <https://doi.org/10.1007/978-3-319-64735-7>
- Moore, S., Timpe, Z., Rasberry, C. N., Hertz, M., Verlenden, J., Spencer, P., & Pampati, S. (2023). Disparities in the implementation of school-based mental health supports among K-12 public schools. *Psychiatric Services*, 75(1), 1-71. <https://doi.org/10.1176/appi.ps.20220558>
- Nastasi, B. K., Overstreet, S., & Summerville, M. (2011). School-based mental health services in post-disaster contexts: A public health framework. *School Psychology International* 32(5), 533-552. <https://doi.org/10.1177/0143034311402926>
- Paschall, M. J., & Bersamin, M. (2018). School-based mental health services, suicide risk and substance use among at-risk adolescents in Oregon. *Preventive Medicine*, 106, 209-215. <https://doi.org/10.1016/j.ypmed.2017.11.004>
- Perkins, K. A. (2025). The promise and imperative for school behavioral health research to promote youth mental health parity. *Mental Health Science*, 3(2), e70014. <https://doi.org/10.1002/mhs.2.70014>
- Planey, A. M., Smith, S. M., Moore, S., & Walker, T. D. (2019). Barriers and facilitators to mental health help-seeking among African American youth and their families: A systematic review study. *Children and youth services review*, 101, 190-200. <https://doi.org/10.1016/j.childyouth.2019.04.001>
- Powers, J. D., Edwards, J. D., Blackman, K. F., & Wegmann, K. M. (2013). Key elements of a successful multi-system collaboration for school-based mental health: In-depth interviews

- with district and agency administrators. *The Urban Review*, 45, 651-670.
<https://doi.org/10.1007/s11256-013-0239-4>
- Racine, N., McArthur, B. A., Cooke, J. E., Eirich, R., Zhu, J., & Madigan, S. (2021). Global prevalence of depressive and anxiety symptoms in children and adolescents during COVID-19: A meta-analysis. *JAMA pediatrics*, 175(11), 1142-1150.
<https://doi.org/10.1001/jamapediatrics.2021.2482>
- Raviv, T., Smith, M., Hurwitz, L., Gill, T. L., Baker, S., Torres, S. A., & Cicchetti, C. (2022). Supporting school-community collaboration for the implementation of a multi-tiered school mental health program: The behavioral health team model. *Psychology in the Schools*, 59(6), 1239-1258. <https://doi.org/10.1002/pits.22683>
- Reinert, M., Fritze, D. & Nguyen, T. (2024). *The state of mental health in America 2024*. Mental Health America. <https://mhanational.org/wp-content/uploads/2024/12/2024-State-of-Mental-Health-in-America-Report.pdf>
- Rider, G. N., McMorris, B. J., Gower, A. L., Coleman, E., & Eisenberg, M. E. (2018). Health and care utilization of transgender and gender nonconforming youth: A population-based study. *Pediatrics*, 141(3). e20171683. <https://doi.org/10.1542/peds.2017-1683>
- Rojas-Andrade, R., & Bahamondes, L. L. (2019). Is implementation fidelity important? A systematic review on school-based mental health programs. *Contemporary School Psychology*, 23(4), 339-350. <https://doi.org/10.1007/s40688-018-0175-0>
- Ross, L., Biswas, B., Halaas, B., & Jones, H. (2020). Analysis of a school-based behavioral health program: Exploring the value of mental health services for vulnerable students. *Journal of School Administration Research and Development*, 5(2), 77-85. <https://doi.org/10.32674/jsard.v5i2.3156>
- Rossen, E., & Cowan, K. C. (2014). Improving mental health in schools. *Phi Delta Kappan*, 96(4), 8-13. <https://doi.org/10.1177/0031721714561438>
- Sanchez, A. L., Cornacchio, D., Poznanski, B., Golik, A. M., Chou, T., & Comer, J. S. (2018). The effectiveness of school-based mental health services for elementary-aged children: A meta-analysis. *Journal of the American Academy of Child and Adolescent Psychiatry*, 57(3), 153-165. <https://doi.org/10.1016/j.jaac.2017.11.022>
- School-Based Health Alliance (2023). *The national census of school-based health centers*. <https://iyi.org/resources/the-national-census-of-school-based-health-centers/>
- Skaar, N. R., Etscheidt, S. L., & Kraayenbrink, A. (2021). School-based mental health services for students with disabilities: Urgent need, systemic barriers, and a proposal. *Exceptionality*, 29(4), 265-279. <https://doi.org/10.1080/09362835.2020.1801437>
- Smith-Ramey, J., Lilley, S., Duis, M., & Volk, F. (2023). Depressed, disconnected, and distraught: School-based mental health intervention for rural youth. *Journal of Rural Mental Health*, 47(4), 240-247. <https://psycnet.apa.org/doi/10.1037/rmh0000240>
- Souza, M. T. D., Silva, M. D. D., & Carvalho, R. D. (2010). Integrative review: What is it? How to do it?. *Einstein (São Paulo)*, 8, 102-106. <https://doi.org/10.1590/s1679-45082010rw1134>
- Substance Abuse and Mental Health Services Administration. (2023). *Project AWARE (Advancing Wellness and Resilience in Education)*. U.S. Department of Health and Human Services. <https://www.samhsa.gov/nitt-ta/project-aware-grant-information>
- Stein, B. D., Kataoka, S., Jaycox, L. H., Wong, M., Fink, A., Escudero, P., & Zaragoza, C. (2002). Theoretical basis and program design of a school-based mental health intervention for traumatized immigrant children: A collaborative research partnership.

- The Journal of Behavioral Health Services & Research*, 29, 318-326.
<https://doi.org/10.1007/BF02287371>
- Stempel, H., Cox-Martin, M. G., O'Leary, S., Stein, R., & Allison, M. A. (2019). Students seeking mental health services at school-based health centers: Characteristics and utilization patterns. *Journal of School Health*, 89(10), 839-846.
<https://doi.org/10.1111/josh.12823>
- Stephan, S. H., Weist, M., Kataoka, S., Adelsheim, S., & Mills, C. (2007). Transformation of children's mental health services: The role of school mental health. *Psychiatric Services*, 58(10), 1330-1338. <https://doi.org/10.1176/ps.2007.58.10.1330>
- Storey, E., Nimroody, T., Prout, T. A., Rice, T., & Hoffman, L. (2023). Feasibility of a psychodynamic school-partnered mental health service: A pilot study. *Journal of Infant, Child, and Adolescent Psychotherapy*, 22(1), 14-27.
<https://doi.org/10.1080/15289168.2023.2166330>
- Stuenkel, M., Koob, C., Richardson, E., Griffin, S. F., & Sease, K. K. (2023). School-based mental health service utilization through the COVID-19 pandemic and beyond. *Journal of School Health*, 93(11), 1000-1005. <https://doi.org/10.1111/josh.13384>
- Swick, D., & Powers, J. D. (2018). Increasing access to care by delivering mental health services in schools: The school-based support program. *School Community Journal*, 28(1), 129-144. <https://www.adi.org/journal/2018ss/SwickPowersSpring2018.pdf>
- Toure, D. M., Kumar, G., Walker, C., Turman, J. E., & Su, D. (2022). Barriers to pediatric mental healthcare access: Qualitative insights from caregivers. *Journal of Social Service Research*, 48(4), 485-495. <https://doi.org/10.1080/01488376.2022.2088949>
- Toronto, C.E. (2020). Overview of the integrative review. In Toronto, C., & Remington, R. (eds) *A step-by-step guide to conducting an integrative review*. Springer.
https://doi.org/10.1007/978-3-030-37504-1_1
- Torraco, R. J. (2016). Writing integrative reviews of the literature: Methods and purposes. *International Journal of Adult Vocational Education and Technology*, 7(3), 62-70. <https://doi.org/10.4018/IJAVET.2016070106>
- U.S. Department of Education. (1975). *Individuals with Disabilities Education Act (IDEA)*.
<https://www.ed.gov/laws-and-policy/individuals-disabilities/idea>
- U.S. Department of Education. (2015). *Every Student Succeeds Act (ESSA)*.
<https://www.ed.gov/laws-and-policy/laws-preschool-grade-12-education/every-student-succeeds-act-essa>
- U.S. Department of Labor. (1973). *Rehabilitation Act of 1973 (Section 504)*.
<https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/statutes/section-504-rehabilitation-act-of-1973>
- Walker, S. C., Kerns, S. E., Lyon, A. R., Bruns, E. J., & Cosgrove, T. J. (2010). Impact of school-based health center use on academic outcomes. *Journal of Adolescent Health*, 46(3), 251-257. <https://doi.org/10.1016/j.jadohealth.2009.07.002>
- Walter, H. J., Gouze, K., Cicchetti, C., Arend, R., Mehta, T., Schmidt, J., & Skvarla, M. (2011). A pilot demonstration of comprehensive mental health services in inner-city public schools. *The Journal of School Health*, 81(4), 185-193. <https://doi.org/10.1111/j.1746-1561.2010.00578.x>
- Walter, H. J., Kaye, A. J., Dennery, K. M., & DeMaso, D. R. (2019). Three-year outcomes of a school-hospital partnership providing multitiered mental health services in urban

- schools. *The Journal of School Health*, 89(8), 643-652.
<https://doi.org/10.1111/josh.12792>
- Wegmann, K. M., Powers, J. D., Swick, D. C., & Watkins, C. S. (2017). Supporting academic achievement through school-based mental health services: A multisite evaluation of reading outcomes across one academic year. *School Social Work Journal*, 41(2), 1-22.
- Weist, M. D., & Christodulu, K. V. (2000). Expanded school mental health programs: Advancing reform and closing the gap between research and practice. *Journal of School Health*, 70(5), 195-200. <https://doi.org/10.1111/j.1746-1561.2000.tb06472.x>
- Weist, M. D., & Evans, S. W. (2005). Expanded school mental health: Challenges and opportunities in an emerging field. *Journal of Youth and Adolescence*, 34, 3-6.
<https://doi.org/10.1007/s10964-005-1330-2>
- Weist, M. D., & Paternite, C. E. (2006). Building an interconnected policy-training-practice-research agenda to advance school mental health. *Education & Treatment of Children*, 29(2), 173-196. <https://psycnet.apa.org/record/2008-00601-004>
- Weist, M. D., Franke, K. B., & Stevens, R. N. (2021). School behavioral health: Interconnecting comprehensive school mental health and positive behavior support. Springer.
<https://doi.org/10.1007/978-3-030-56112-3>
- Werlen, L., Gjukaj, D., Mohler-Kuo, M., & Puhon, M. A. (2020). Interventions to improve children's access to mental health care: A systematic review and meta-analysis. *Epidemiology and Psychiatric Sciences*, 29, e58. <https://doi.org/10.1017/S2045796019000544>
- Werner-Seidler, A., Perry, Y., Calear, A. L., Newby, J. M., & Christensen, H. (2017). School-based depression and anxiety prevention programs for young people: A systematic review and meta-analysis. *Clinical Psychology Review*, 51, 30-47. <https://doi.org/10.1016/j.cpr.2016.10.005>
- Whitaker, K., Nicodimos, S., Pullmann, M. D., Duong, M. T., Bruns, E. J., Wasse, J. K., & Lyon, A. R. (2018). Predictors of disparities in access and retention in school-based mental health services. *School Mental Health*, 10, 111-121.
<https://doi.org/10.1007/s12310-017-9233-4>
- Williams, E. D., Lateef, H., Gale, A., Boyd, D., Albrecht, J., Paladino, J., & Koschmann, E. (2023). Barriers to school-based mental health resource utilization among Black adolescent males. *Clinical Social Work Journal*, 51, 246-261.
<https://doi.org/10.1007/s10615-023-00866-2>
- Young, E., Szucs, L. E., Suarez, N. A., Wilkins, N. J., Hertz, M., & Ivey-Stephenson, A. (2023). Disparities and trends in middle school students' suicidal thoughts and behaviors: Results from the Youth Risk Behavior Survey, 2015–2019. *Journal of Adolescent Health*, 74, 720-728. <https://doi.org/10.1016/j.jadohealth.2023.11.008>
- Zabek, F., Lyons, M. D., Alwani, N., Taylor, J. V., Brown-Meredith, E., Cruz, M. A., & Southall, V. H. (2023). Roles and functions of school mental health professionals within comprehensive school mental health systems. *School Mental Health*, 15(1), 1-18. <https://doi.org/10.1007/s12310-022-09535-0>
- Zhang, Q., Wang, J., & Neitzel, A. (2023). School-based mental health interventions targeting depression or anxiety: A meta-analysis of rigorous randomized controlled trials for school-aged children and adolescents. *Journal of Youth and Adolescence*, 52(1), 195-217.
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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>

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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., Feirsén, 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., Ballester, 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>

Measuring High School Counselor Beliefs on the Importance of MTMDSS Universal Supports Since COVID-19

Ryan J. Carter

San José State University

Lorri M. Capizzi

San José State University

Brent Duckor

San José State University

The onset of the 2019 coronavirus disease (COVID-19) pandemic in the United States (U.S.) brought immediate and unprecedented disruption to kindergarten through twelfth grade (K-12) education. California high school counselors, faced with the dilemma of how to support student needs effectively and equitably during COVID-19, have looked to the state government and professional organizations for guidance on best support practices. While multi-tiered support frameworks, such as Multi-Tiered System of Supports (MTSS) and Multi-Tiered, Multi-Domain System of Supports (MTMDSS) have been increasingly recommended as part of the pandemic response, the effective use of MTSS/MTMDSS by school counselors presupposes a degree of belief in these frameworks. This study explored and measured California high school counselor beliefs about the importance of MTMDSS (Tier 1) universal supports since the onset of the COVID-19 pandemic. Data collected from 101 California high school counselors through the Universal Supports Importance Scale (USIS) survey instrument and from six follow-up semi-structured interviews suggested that counselors have high levels of belief in the importance of MTMDSS universal supports. Preliminary results of this USIS validation study displayed strong evidence for overall quality of valid and reliable scale score interpretation for measuring school counselor beliefs, offering promise for future diagnostic and formative uses of the USIS instrument in professional development settings.

Keywords: beliefs, school counselor, MTSS, MTMDSS, COVID-19, item response modeling, IRT scaling

The objective of secondary school counseling is “to help students overcome barriers to learning and to prepare for successful lives after high school graduation” (American School Counselor Association [ASCA], 2019, p. x). The United States (U.S.) onset of the 2019 coronavirus disease (COVID-19) pandemic in March 2020, brought immediate and unprecedented disruption to California secondary education, beginning with school closures, transitions to distance learning, and new modes of instruction (Savitz-Romer et al., 2021).

Correspondence concerning this article should be addressed to Ryan J. Carter, San José State University, Center for Innovation in Applied Education Policy, Lurie College of Education, Sweeney Hall 420, One Washington Square, San Jose, CA 95192-0073. Email: ryanjcarteredd@gmail.com.

Throughout the pandemic, California high school students have endured varying degrees of uncertainty, hardship, and trauma, resulting in an evolving range of student needs (American Academy of Pediatrics [AAP], 2021; Minkos & Gelbar, 2020; Murata et al., 2021; Watson et al., 2022). Students have experienced the pandemic in vastly different ways depending on a variety of intersectional and demographic factors with the most significant impact on students from underrepresented and/or marginalized backgrounds (Azar et al., 2021; Goldhaber et al., 2022; Sullivan et al., 2020). Emerging research has revealed a correlation between the amount of time spent in distance learning and declines in academic achievement, with the most profound impact on students of color and/or students attending high-poverty schools (Goldhaber et al., 2022; Jack et al., 2021). Beyond declines in academic achievement, students have reported significant increases in anxiety, depression, stress, loneliness, chronic absenteeism, and suicidal ideation (AAP, 2021; Gazmararian et al., 2021; Murata et al., 2021).

U.S. public education has long been criticized for its inequities, yet public school campuses also provide some level of equalizing when students are on campus (Downey et al., 2004). While the sudden transition to distance learning during the COVID-19 pandemic spotlighted inequities within educational systems in California, social movements building in tandem with the pandemic such as the Black Lives Matter movement, gained national prominence and created a swelling of demand for social justice and equity throughout societal institutions, including kindergarten through twelfth grade (K-12 education (Sullivan et al., 2020). Many California public school districts responded by instituting equity-oriented goals, curriculum, institutional policy and practices, and state-endorsed systems of support to ensure the success of all students (Largent et al., 2021; Orange County Department of Education [OCDE], 2020). California high school counselors, faced with the dilemma of how to support student needs effectively and equitably with limited resources during COVID-19, have looked to the state as well as professional organizations for guidance on best support practices.

Multi-tiered support frameworks, such as Multi-Tiered System of Supports (MTSS) and Multi-Tiered, Multi-Domain System of Supports (MTMDSS) existed prior to COVID-19 and have emerged as prominent pandemic response recommendations (Sailor et al., 2021). Multi-tiered intervention models are designed to offer a systemic, data-driven, and equity-oriented approach to supporting students by deploying varying degrees of intervention intensity, based on student need (Belser et al., 2016). Within a three-tiered structure, *Tier 1* is considered a *universal supports* intervention because all students in a school receive it. *Tier 2* and *Tier 3* interventions are progressively more targeted and intensive for a smaller portion of students whose needs are not fully met by a lower tier. Multi-tiered models are currently being implemented by school districts throughout California as preventative frameworks that focus on distributing limited school resources equitably to ensure the success of all students (California Department of Education [CDE], 2022; OCDE, 2020; Sullivan et al., 2020).

MTSS/MTMDSS Prominence

Multi-tiered support frameworks have been gaining ground in public education nationally throughout recent decades. The 2015 signing into law of the Every Student Succeeds Act (ESSA) specifically called for MTSS in public education (Braun et al., 2018). Since then, multiple states have instituted statewide MTSS models, including California. Prior to the arrival of COVID-19, the California Department of Education (CDE) embraced MTSS as “essential” and adopted a state MTSS model (CDE, 2022; Sailor et al., 2021).

Recent state legislation has intensified MTSS prominence within school districts throughout California. California Assembly Bill (AB) 104 and Senate Bill 828 funded a “scaling-up” of MTSS (CA SUMS) to encourage school districts throughout the state to “establish and align school-wide, data-driven systems of academic and behavioral supports to more effectively meet the needs of California’s diverse learners in the most inclusive environment” (OCDE, 2020, p. 2). California’s MTSS model is designed to align with California’s Eight State Priorities, Local Control Funding Formula (LCFF), and Local Control Accountability Plan (LCAP), which allows for California MTSS to be the “driver” of a statewide system of support (OCDE, 2020).

MTSS, which focuses on data-driven academic and behavioral support interventions, is intended to be a schoolwide system, drawing from the contributions of administrators, teachers, counselors, staff, families, and the community (Belser et al., 2016; Bohanon et al., 2021; Sailor et al., 2021). As MTSS has become increasingly prevalent in California public schools, school counselors have considered how to align their curriculum and standards with the MTSS framework. In 2017, Dr. Tricia Hatch, a founding research contributor to the ASCA National Model for school counseling, introduced a school counseling-specific delivery model that aligns the three main competency domains of the ASCA National Model (academic development, social-emotional development, and college and career readiness development) with MTSS.

Multi-Tiered, Multi-Domain System of Supports (MTMDSS) provides school counseling programs a way to directly align their standards and competencies within a multi-tiered structure (Hatch et al., 2019). In alignment with MTSS, MTMDSS operates within the same three-tier intervention structure and emphasizes data-driven decision making and evidence-based practices in core instruction to address the needs of all students (Hatch et al., 2019). Unlike MTSS, which focuses only on the two domains of academic and behavioral support, MTMDSS also includes multi-tiered interventions focused on the college and career readiness domain of the ASCA National Model. Thus, MTMDSS was created to provide a supplement to the MTSS model by delivering interventions in all three ASCA National Model domains, across all three tiers (Geiger & Oehrtman, 2020). Since its arrival, ASCA and California’s state charter of ASCA, the California Association of School Counselors (CASC), included MTMDSS as a delivery model recommendation for MTSS within school counseling programs (ASCA, 2020; CASC, 2020).

Recommendations for California school counselors to utilize MTSS/MTMDSS have increased since the arrival of the COVID-19 pandemic. In the fall of 2022, California’s state legislature passed Assembly Bill (AB) 2508, with the governor signing it into law and California Education Code shortly thereafter. California Education Code (1987/2022) calls on public school counseling programs throughout California to “work within multi-tiered systems of support that use multiple data sources to monitor and improve pupil behavior, attendance, engagement, and achievement” (California Education Code, §49600, [c3]). School counseling professional standards and competencies, guided by national and state professional organizations, have also increasingly called for school counselors to align their roles with multi-tiered support frameworks since COVID-19. For example, in 2023, CASC adopted a new set of school counseling standards calling upon California school counselors to design and implement counseling programs that align with California’s MTSS framework (CASC, 2023). Recommendations for school counselors to utilize MTMDSS to deliver multi-tiered school counseling support interventions presuppose their belief in these systems, which holds implications for successful implementation.

School Counselor Beliefs and Behavior

School counselor beliefs about school counseling program components and supports are an important construct to consider, as they may impact the likelihood of successful implementation (Dahir, 2004; Hatch & Chen-Hayes, 2008; Pérusse et al., 2004; Sink & Yillik-Downer, 2001). Sink and Yillik-Downer (2001) examined 1,033 school counselors' views on comprehensive guidance and counseling programs across western, midwestern, and southern regions of the U.S. and revealed a moderate relationship between the level of importance school counselors ascribe to their program and how involved they become with the development and implementation of it (Lauterbach et al., 2018). The 2001 study that guided the development of the ASCA National Model for School Counseling drew upon the theoretical underpinnings of Ajzen's Theory of Planned Behavior, which posits that beliefs can predict and influence behavior (Ajzen & Fishbein, 1980; Hatch & Chen-Hayes, 2008). Ajzen's tested theory (Knabe, 2012; Teo et al., 2016) has also informed the construct development of this study.

National Events of Educational Significance, Beliefs, and School Counseling Supports

This study sought to explore beliefs within the context of a major event of educational significance (the COVID-19 pandemic). Epstein's social cognition-oriented Cognitive-Experiential Self-Theory (CEST) posits that beliefs are influenced by significant events (Epstein, 2003). Multiple studies have tested this theory, including Fletcher (1988) and Catlin and Epstein (1992), which demonstrated associations between significant events and impacted beliefs.

Examination of the historical arc of the school counseling profession reveals abundant literature demonstrating the connection between national events of educational significance, school counselor beliefs, and the changing landscape of school counseling supports (Lauterbach et al., 2018). The direction and prominence of school counseling in U.S. education throughout its first half-century of existence was influenced by significant national events including: the industrial revolution which prompted a focus on vocational guidance around the early 1900s; the emergence of cognitive development, psychological theory, and humanistic movements of the 1920s, 1930s, and 1940s which led to student-centered support related to personal needs; and the launch of Sputnik and the subsequent National Defense Act of the 1950s, which resulted in increased investment in education, nearly doubling the number of school counselors in the U.S. (Aubrey, 1977; Blake, 2020; Gladding, 2013; Lambie & Williamson, 2004; Shertzer & Stone, 1981; Williams & Lair, 1991). A wave of professionalization in the 1980s led to early counselor education standards and the accreditation body, The Counsel for Accreditation of Counseling and Related Educational Programs (CACREP) and ASCA, which gave increasing visibility, legitimacy, and direction to the profession (Gladding, 2013; Schweiger et al., 2007).

The standardization and accountability movement in U.S. education throughout the late 1990s and early 2000s, and including the 2001 No Child Left Behind (NCLB) Act, influenced the beliefs of ASCA members, who saw a need for a set of national standards and a standardized school counseling model that could measure the outcomes and impact of school counseling programs on student development and achievement (Campbell & Dahir, 1997; Hatch & Chen-Hayes, 2008). In 1995, ASCA deployed a survey instrument to 2,000 members to measure beliefs about the need for standardization, as well as identification of standards, priorities, and best practices. In 1997, ASCA created its inaugural set of national school counseling standards developed with the input of school counselor attitudes and beliefs (Campbell & Dahir, 1997). In 2001, ASCA again sought the beliefs of school counselors as it set out to create a national school counseling model guided by standards and competencies-based curriculum, as well as data-supported outcomes

measurement. The School Counseling Program Component Scale (SCPCS), which aimed to measure school counselor beliefs about the proposed components of the forthcoming ASCA National Model, was deployed to 3,000 school counselors throughout the

U.S. The SCPCS served as a primary data source in the development and finalization of the inaugural ASCA National Model for School Counseling launch in 2003 and has been redeployed to re-evaluate how those beliefs have evolved over time and with changes in education (Hatch & Chen-Hayes, 2008; Hatch et al., 2015).

School Counselor Beliefs on MTSS/MTMDSS

The available literature on school counselor beliefs related to MTSS/MTMDSS frameworks in the U.S. is, at present, limited. Previous studies have explored: school counselor beliefs related to earlier iterations of MTSS, such as Response to Intervention (Patrikakou et al., 2016), counselor knowledge and skills of MTSS frameworks (Olsen et al., 2020), the connection between MTSS training and school counselor perceptions about components of school counselors' roles (Goodman-Scott et al., 2022), and recently, the relationship between school counselor beliefs of the MTSS framework and implementation (Edwin & Bahr, 2023). Literature examining high school counselor beliefs on the importance of MTMDSS framework interventions since the onset of the COVID-19 pandemic, however, is currently unavailable.

Consequently, professional school counseling organizations in the U.S. and California, California Education Code, and California public schools/districts, are recommending and delivering MTSS/MTMDSS frameworks in their pre-pandemic formats without a body of research to assess the extent to which school counselors consider them important since COVID-19. These gaps in the extant literature indicate a need for research in this area. This study took the first steps of measuring high school counselor beliefs on the importance of MTMDSS, by focusing on one of the multiple dimensions that make up the MTMDSS model.

Purpose of the Study

The purpose of this study was to explore and measure California high school counselor beliefs on the importance of MTMDSS universal supports since the onset of the COVID-19 pandemic. The research questions that were addressed in this study are: (1) What are California high school counselors' beliefs about the importance of Multi-Tiered, Multi-Domain System of Supports (MTMDSS) universal supports since the onset of the COVID-19 pandemic?, (2) Which variables, if any, predict/explain these universal supports-based beliefs?, and (3) Can these universal supports-based beliefs be measured reliably, and is there validity evidence to trust the meaningfulness of the scores generated by the Universal Supports Importance Scale (USIS) instrument?

Methods

Design and Instrumentation

This study utilized an explanatory sequential mixed methods design that included two phases of data collection. Mixed methods research is recognized to support deeper insight into a problem or phenomena being studied, by combining data collection and rigorous analysis methods, thereby

bolstering the limits of the methods in isolation (Creswell & Creswell, 2018; Yin, 2006). Utilizing the strengths of these approaches, two instruments were designed, deployed, and used to collect a robust body of evidence, explore a complex construct (school counselor beliefs), and address the research questions presented in this study. An online survey was designed to collect a representative sample of high school counselors' beliefs about MTMDSS universal supports across California; a semi-structured interview protocol was employed to triangulate survey responses and probe for deeper themes with in-depth interviews from survey takers. These instruments were designed to capture descriptive and demographic data, in addition to examining recurring themes and patterns in high school counselor beliefs.

Universal Supports Importance Scale Design (USIS)

The Universal Supports Importance Scale (USIS) was designed to measure high school counselor beliefs on the importance of (Tier 1) universal supports within the MTMDSS model. The scale's design was informed by best practices of education measurement and assessment. By utilizing the National Research Council's Assessment Triangle (NRC, 2001) and Wilson's building blocks of instrument development (Wilson, 2005), evidence to support valid and reliable inferences drawn from the scale was obtained with quantitative methods.

Survey Design. The bulk of the survey was designed to measure how important high school counselors believe universal supports are since COVID-19 (see Table 1). Likert style items with a five-category outcome space ranging from *strongly agree* to *strongly disagree* were divided between four overarching types of school counseling interventions prescribed by the MTMDSS model's (Tier 1) universal supports interventions. The four facets of practice include: (1) school counseling curriculum, (2) individualized student planning, (3) schoolwide events, and (4) parent education events. The second portion of the USIS was designed to examine whether various demographic variables predict or explain school counselor beliefs. Finally, exit interview items were used to check the validity of the USIS responses from a psychometric perspective.

Semi-Structured Interview Protocol

Qualitative data were collected through semi-structured interviews designed to promote a deeper understanding of the quantitative data collected, as well as triangulate the researcher's preliminary analysis and interpretations of the quantitative results (Creswell & Creswell, 2018; Yin, 2006). The interview protocol was designed to align with survey items from the quantitative phase of the study. Consistent with the USIS instrument, the semi-structured interview protocol focused on the same four facets of practice within the MTMDSS model's universal supports. The interview protocol revisited items within Part 1 of the USIS survey instrument, by asking a single question related to the importance of each facet of practice. For example, the interview question for the core curriculum facet of practice was, "As a high school counselor, how important is having a planned school counseling curriculum that reaches all students since COVID-19?" A series of follow-up probes were deployed to elicit narrative explanations with the goal of providing deeper context and understanding of survey participants' cognitive processes, survey responses, and levels of belief. Examples of probes included, "Can you explain?" and "Can you give some examples?" Each interview participant received the same interview protocol.

Participants and Sampling

To measure California high school counselor beliefs on the importance of MTMDSS universal supports, high school counselors actively employed throughout the state of California were invited to participate in the study. Counselors were identified through publicly available high school counselor directories throughout California and the CASC membership directory (the CASC directory listed approximately 515 high school counselors). These multiple sampling sources were utilized to increase participation and encourage a sample that was representative of the statewide composition of high school counselors. Using purposive sampling (Patton, 2105), the researcher considered both school counselor and school community demographics in identifying potential interview candidates for the qualitative phase to ensure that the qualitative participant population would (1) be reflective of diverse statewide school counselor demographics, and (2) align as closely as possible to the sample demographics from the quantitative phase. The demographics considered included gender identity of counselor, race/ethnicity identity of counselor, counselor years of experience in the field, school county type, and school population socio-economic indicators.

Data Collection Procedures

Following institutional review board (IRB) approval, research was conducted during the third year of the COVID-19 pandemic. The 903 school counselors identified as meeting criteria for participation were invited to respond to an anonymous online survey near the start of the 2022/2023 academic year. Preliminary data analysis began once the survey data had been collected, and this informed further refinement of the qualitative phase of the study. A small sample of school counselors were invited to participate in a 30-minute semi-structured interview, which took place remotely. Transcription of interviews preceded qualitative, quantitative, and side-by-side data analyses.

Analyses

Qualitative Data Analysis

Following transcription of the semi-structured interviews, case profiles were created for each of the purposively sampled interviewees with key demographic information and responses for each question. Validity evidence produced by the exit interview items provided a trustworthy measurement to ensure credible results from the qualitative portion of this mixed methods study. Deductive thematic analysis was applied to the response data, using a coding system developed based on the predetermined facets of practice, as well as recurring emergent thematic patterns within interviewee responses (Braun & Clarke, 2006). Codes were applied to excerpts manually and using Dedoose software to identify each theme in the content analysis of the data as well as facilitate quantitative and qualitative side-by-side data analysis.

Quantitative Data Analysis

Descriptive statistics analysis was performed in SPSS Statistics (Version 28) to observe frequencies for all survey items as well as demographic items. Item response models were then fit

to the survey responses to obtain fit indices, including item “difficulties” and person “endorsability” estimates, on a unidimensional scale using ConQuest (Adams et al., 2020; Wilson, 2005). Wilson (2005) notes that both of these parameters in a Rasch model are meant to represent the probable locations of survey respondents’ willingness to endorse a particular statement on the USIS scale. A logit value is assigned based on the ConQuest estimation procedures. Three linear regression models were then applied to the data utilizing SPSS to explore the potential relationship between the dependent response variable (school counselor beliefs) and the independent explanatory variables (such as years of experience in the field, gender, or urbanicity of school district). In total, seven explanatory variables were used in differing combinations within the different linear regression models: (1) urbanicity of school community, (2) percentage of students who qualify for free and reduced lunch (socioeconomic indicator), (3) number of years worked as a school counselor, (4) professional membership in CASC, (5) gender identity of school counselor, (6) race/ethnicity identity of school counselor, and (7) age of school counselor. In all three models, the dependent variable was the degree of school counselors’ belief in the importance of MTMDSS universal support interventions, as measured by the USIS. Collinearity diagnostics were also run to examine Variance Inflation Factor (VIF) effects, if any.

Evidence of Validity and Reliability to Support Scale Uses

Checking for validity and reliability of the USIS was a central focus of this study. Systematic evidence was collected to eliminate or reduce, where possible, threats to meaningful and dependable scale score interpretations. This was critical in the development of the USIS, to ensure that the instrument measured what it claims to measure, consistently and dependably.

Evidence for USIS Scale Validity. The USIS was developed utilizing several strategies as checks for content validity. Content validity evidence was collected through construct maps and expert panel reviews during the development of the items design (Wilson, 2005). Response process validity evidence was collected and examined through a panel think aloud protocol and the survey’s exit item questions. Item Response Theory (IRT) Analyses, Wright maps, and Differential item functioning (DIF) analysis were utilized to produce internal structure validity evidence and confirm alignment between construct maps and the survey’s items design (Wilson, 2005).

Evidence for USIS Scale Reliability. Internal consistency data were collected to explore and understand the reliability of the survey instrument. Two internal consistency coefficients, Cronbach’s alpha and Person separation, were generated to document the reliability of the instrument. In classical test theory, Cronbach’s alpha (1951) is accepted as an indicator of internal consistency, particularly with polytomous response data, as was used in this study. In Rasch IRT modeling, a comparable indicator of internal consistency is person separation reliability (Wright & Masters, 1982).

Results

Participant Characteristics

Participant demographics were central to this study, as they played a key role in addressing the study’s second research question. The 101 participants who completed the entire USIS survey were

highly educated professional school counselors (99% earned master's degrees or higher), predominantly (89%) working in comprehensive California public high schools. Most respondents (78.2%) were female and 21.8% were male. Respondents' ages varied, with 65% between the ages of 30-49 years old. White school counselors made up a slight majority of the respondents at 53.5%. Hispanic or Latino/a/x school counselors were 36.6%. The majority of respondents (57.9%) had more than ten years of experience working as a school counselor, nearly 20% had between 5-9 years, and 22.6% had fewer than five years of experience in the field. The majority (58.8%) of high schools were located in suburban counties, while 22.5% were located in urban counties and 18.6% were located in rural counties. Respondents served a diverse range of students across socioeconomic indicators. Table 2 presents a summary of the personal demographics of the school counselors who participated in the survey. Table 3 presents a summary of the school community demographics identified by the school counselors who participated in the survey.

Among the six participants who were interviewed for the qualitative phase of this study, four were female and two were male. Three of the participants identified as Hispanic or Latino/a/x, two as White, and one as Black/African American. The reported number of years working in the field of school counseling were: 1 year, 3 years, 6 years, 10 years, 16 years, and 23 years. Half of the participants were active members of ASCA, and one was a member of CASC. All six of the interview participants worked at comprehensive public high schools, with a distribution of urbanicity and socioeconomic school profiles that aligned with the larger, quantitative sample.

Dimensionality of School Counselor Beliefs on Universal Supports Facets

Table 4 contains a summary of results from Part 1 of the USIS which measured school counselor beliefs about the importance of MTMDSS universal supports since COVID-19. As the summary shows, there was a high rate of agreement with all USIS items within the four universal supports facets of practice. This resulted in a distribution of responses, with over 75% of responses falling into the *agree* or *strongly agree* outcome spaces for all 21 items across the four facets (school counseling curriculum = 85% or more of responses, individualized planning = 80% or more of responses, schoolwide events = 75% or more of responses, and parent education events = 75% or more of responses). *Neutral* responses were low overall, with no more than 13% of responses falling into this outcome space across all/any items and facets. *Disagree* responses were sparse (no more than 5% of responses) on each item across all facets of practice. None of the items in any facet received *strongly disagree* responses. The median scores for each ordinal type item are reported in Table 4.

Overall, the semi-structured interview responses reflected the frequencies and ranges of beliefs observed in the survey response data throughout each facet. There was relatively strong alignment between participants' survey responses and their semi-structured interview responses for each facet of practice. The interview participants described school counseling curriculum, individualized planning, schoolwide events, and parent education events facets of universal supports as being "important," "very important," "critical," and "essential." Taken together, these statements suggest a pattern of high levels of belief in the importance of MTMDSS universal supports. As was the case in the survey results, there were no strong disagreements within any facet amongst the interviewees. Figure 1, Figure 2, Figure 3, and Figure 4 present side-by-side analyses of the variation in responses on the importance of each respective facet of practice, as sampled from survey items and the primary interview question for each facet.

Follow-up probes initiated by the researcher revealed additional context and depth to

counselors' degree of beliefs. This included additional levels of enthusiasm, neutrality, and skepticism. Figure 5 demonstrates a range of interviewees' beliefs within each facet.

Additionally, two new themes emerged from the interview responses. First, a pattern of conflict and dissonance within interviewees' beliefs of overall importance of an intervention emerged repeatedly from the interviews. For example, one interviewee described a school counseling curriculum as "definitely important," but also expanded on the dissonance between her beliefs and perceived realities of practice since the arrival of the pandemic.

I don't know if it's been long enough for us to really be able to think about all those things. I think we're still in this stage of trying to get back to something normal. I think last year, being our first year back on campus, it was just kind of like a 'what are we doing?' type of thing. So, it's definitely important, but probably like a 5 out of 10 right now. It's definitely important, but I don't know how that's really been the priority.

A second recurring emergent theme revealed by the interviews was the immediate need for school counseling interventions to address new student needs since COVID-19. The most prominent needs that emerged from these conversations were (1) the need for students to establish/re-establish personal connections within their school community, (2) the need for prioritizing equity within school counseling services, (3) the overwhelming need for student mental health and wellness/SEL support, and (4) the need to address gaps in student learning, motivation, and social-emotional skills upon returning from distance learning. For example, one interviewee shared the need at her school for mental health support since COVID-19.

Living through the pandemic. . . There's more of an urgency to it [individualized planning], because it's also addressing the social-emotional piece. Yes, social- emotional. In the last two years, it has been essentially what I do. I'd say almost 90% of my day and it's become higher-level. I would say my typical day consists of students suffering from major depression, generalized anxiety, panic attacks where students are unable to get out of bed, chronic absenteeism, students that have experienced sexual assault—it's just been constant. I have several students hospitalized. So, yes, it's the social-emotional needs, I can't even describe how much this has grown. I've always thought it [individualized planning] was important, but for different reasons—to provide students with agency, and, that they're able to make these decisions for themselves, and know the ins-and-outs of how to make that all happen. But since COVID, the [4-year] plan is actually being used to address social-emotional consequences of the pandemic, like anxiety. . . and so we started doing 4-year planning with ninth graders again this school year . . .and I can't imagine not doing them. They are critical right now.

Factors Influencing School Counselor Beliefs

Three separate regression analysis models were utilized to address this study's second research question and explore the different possible interactions between predictor variables and the outcome variable. Table 5 demonstrates the effect of explanatory variables for the second regression model. All three regression analyses revealed no statistically significant relationships between the explanatory variables and school counselor beliefs at the $\leq .05$ level. Thus, it is not reasonable to conclude from these analyses that any of the variables measured predict or explain

the degree of school counselor beliefs on the USIS. Both models produced low VIF levels of less than 2.5, an acceptable threshold according to conservative research authorities (Allison, 1999; 2012; Johnson et al., 2018). This suggests that there were no problems with multicollinearity in these multiple linear regression analyses.

USIS Validation Findings

Content Validity Evidence

Construct maps (Wilson, 2005) provide a model for the construct being measured and are designed to ensure an instrument's items align with the range or continuum of the construct. Construct maps developed for this study produced a visual representation and guiding framework for the construct being measured (degree/range of school counselor belief in the importance of universal supports) by the USIS (see Figure 6). The USIS items design was aligned to the construct maps and items were reviewed repeatedly, at each stage of development, by a panel of school counseling experts (who were not participants in the study). This ongoing and iterative review process led to several improvements of the USIS items leading up to its deployment.

Response Process Validity Evidence

The exit interview section of the USIS revealed that 100% of the school counselors who completed the USIS responded to all exit interview questions, 100% of the respondents reported that they had enough time to complete the survey and 87% found the questions to be clear. The panel think aloud protocol, conducted prior to the deployment of the USIS to study participants, consisted of three current California high school counselors, who went through the survey item- by-item and offered their interpretations, concerns, and suggestions for improving the items in an iterative process with each other and the researcher. The evidence document produced from the panel think aloud was triangulated by the study's expert panel as an additional validity checkpoint.

Internal Structure Validity Evidence

The Wright Map. The Wright map was generated with ConQuest software and represents the unidimensional scale of the USIS. Wright maps visually display evidence of a measurement scale's range of responses and are useful in detecting poor item fit (Wilson, 2005). Figure 7 presents this study's Wright map. The left side of the Wright map represents USIS respondents at various levels of belief and is referred to as person proficiencies. The right side of the Wright map represents the probability of individual USIS items to be endorsed by respondents at each belief logit level, referred to as item thresholds. The distribution of respondent and item locations is on a single logit scale. The relationship between the left and right side of the Wright map indicated that the respondents were not covered across their entire range by the item thresholds, particularly on the higher end of the school counselor belief logit scale. In particular, approximately 95 (83%) of the respondents were 50% or more likely to achieve the third step (.2 = *strongly agree*) on the most difficult to endorse items. Conversely, the first step (.0 = *disagree – neutral*) on all 21 items was 50% or more likely to be achieved by all respondents with the lowest proficiency. The second step (.1 = *agree*) was 50% or more likely to be achieved by nearly all respondents with the lowest proficiency. This distribution indicates that overall, most respondents found most items easy to

endorse.

Model Fit. Additional internal structure validity evidence was collected through a partial credit model to generate an item fit analysis. The results and analysis of the weighted mean square fit and t statistics support the finding that all USIS instrument items fit the partial credit model well. Table 6 provides the parameter estimates, standard errors, and mean square weighted fit and t statistics for the partial credit model applied to the USIS instrument data. All of the USIS item's mean square values are within the commonly accepted lower (0.75) and upper (1.33) boundaries (Adams & Khoo, 1996; Wilson, 2005). Thus, no misfitting items were identified.

IRT Analysis. The general results of the item analysis suggest that individual items across the USIS instrument were generally stable and consistent. The analysis of the mean person locations for all items indicated that 20 of the 21 items displayed well-functioning mean locations and one item displayed a lack of consistency. Overall, the results of the item analysis for the USIS instrument show that all but one of the 21 individual items are consistent with the instrument as a whole. This result means that, on the whole, the USIS instrument is consistently and meaningfully measuring participants' beliefs about the importance of universal supports.

DIF Analysis. Differential item functioning (DIF) occurs when different groups of examinees with similar overall ability have, on average, systematically different responses to a particular item (American Educational Research Association [AERA] et al., 2014). Gender and ethnicity DIF analyses of belief surveys matter because this study's instrument is intended to measure diverse respondents in California's school counselor population in an unbiased manner. The gender DIF model examined the following terms: (a) item, (b) gender, and (c) item and gender by step. The ethnicity DIF model examined the following terms: (a) item, (b) ethnicity, and (c) item and ethnicity by step.

To decide whether any of these differences are evidence for DIF, confidence intervals at the 95% level were constructed around the male and female identified (gender) and White and Underrepresented Groups-identified (ethnicity) subgroup thresholds to determine whether they overlap. According to Wilson (2005), any differences can be subjected to the "effect size" test. A standard of effect size for Rasch models is reported: a logit difference value less than .426 is "negligible," a value between .426 and .638 is "intermediate," and a value over .638 is "large" (Paek, 2002). For this study, gender DIF was negligible (-0.095). Similarly, the ethnicity DIF was negligible (-0.006). The effects of random chance alone may explain the difference in scores between gender subgroups and ethnicity subgroups of respondents on the USIS instrument.

The results of the partial credit model fit, Rasch IRT item analysis, and DIF analysis provide strong evidence for the quality of the overall item design for the USIS instrument. The scaling properties of the instrument have been demonstrated through these procedures, and the survey is reliable and valid for its intended research purposes. More validity evidence (AERA et al., 2014) can be gathered over multiple occasions and for other uses (e.g., diagnostic purposes or formative interventions in professional development settings) in the future, but the USIS scale for research purposes shows it is an unbiased indicator and measure of school counselor beliefs.

Reliability Evidence

Cronbach's alpha and Person separation coefficients were generated to document the reliability of

the USIS instrument. Table 7 shows the internal consistency reliability coefficients for the USIS instrument. The reliability evidence based on internal consistency coefficient values shown in Table 7 suggests that the USIS is a reliable indicator ($r = .85$) of high school counselor beliefs and supports the scale's limited use in future research.

Discussion

This study's findings for the first research question suggest that school counselors believe in the importance of the interventions within the primary tier of the MTMDSS framework. Given the increased prominence of multi-tiered supports, high levels of school counselor belief on the importance of MTMDSS universal supports is not surprising. Within these enthusiastic beliefs, however, two themes emerged from participant narratives.

First, there is complexity and a degree of cognitive dissonance with the subjects' reported beliefs about the realities of counseling and their aspirational ideals, not fully captured by the USIS instrument (Festinger, 1957). This study's interview participants described examples of how they struggle to connect their professional ideals (e.g., that the recommended MTMDSS universal supports are "important," "necessary," "essential") to the realities they perceive within their practices since COVID-19. This dissonance tracks with recent research in California suggesting that educators who believe strongly in MTSS importance, nonetheless, still struggle to prioritize its implementation during/since COVID-19 (California MTSS et al., 2021). As one school counselor put it, "I think it's really important. But it's one thing to believe that something is important on its face, and it's another to make it happen once my school day begins."

The second theme relates to the current and emerging literature on the impacts of the COVID-19 pandemic on student needs and counselors' roles in addressing these needs. Although not the focus of this study's research questions, the school counselors interviewed shared immediate intervention areas of focus needed in their practices to support the student needs that they have encountered since the arrival of COVID-19. The most prominent needs that emerged from these conversations were (1) the need for students to establish/re-establish personal connections within their school community, (2) the need for prioritizing equity within school counseling services, (3) the overwhelming need for student mental health and wellness/SEL support, and (4) the need to address gaps in student learning, motivation, and social-emotional skills upon returning from distance learning. The school counselors interviewed for this study described these needs as impactful on their practices as well as their beliefs about why the facets of universal supports are important since COVID-19.

Three separate linear regression analysis models were utilized in this study to address the second research question and explore the different possible interactions between demographic predictor variables and school counselor beliefs on the importance of MTMDSS universal supports. All three analyses revealed no statistically significant relationships between the explanatory variables and school counselor beliefs. Thus, it is our conclusion that within this study's findings, none of the variables studied predicted or explained school counselors' universal supports-based beliefs.

To address the third research question, the USIS instrument underwent a robust IRT focused validation study. This was based on evidence drawn from the Standards for Educational and Psychological Testing (AERA et al., 2014). The USIS displayed strong evidence for overall quality of valid and reliable score interpretation, offering promise for future diagnostic and formative uses.

Limitations

There are several limitations with the results from this study on school counselors' beliefs about the importance of universal supports during the pandemic and in its aftermath. Although this study was able to recruit a relatively representative sample of California high school counselors across school community, professional, and personal demographic indicators, a larger sample size would be helpful in improving the generalizability of the findings. This study employed a cross-sectional rather than longitudinal sample of beliefs of school counselors working at the high school level, within the state of California. A stratified random sampling method embedded in longitudinal research may be useful in examining how school counselor beliefs evolve over time in response to particular periods or events. Lastly, despite strong evidence for the validity and reliability of the measurement tool, the use of the USIS tool in this sample tended to register endorsement for positive (*agree* and *strongly agree*) elements of the scale. In addition to sample size and other factors related to the study design, this may account for failure to identify predictive relationships through regression analyses.

Recommendations

These preliminary findings yielded three recommendations for further study. First, future research is needed to explore the complex, and at times dissonant relationship between school counselors' ideals and beliefs about MTSS/MTMDSS, their perceived and experienced realities of practice since COVID-19, and their implementation of multi-tiered support frameworks. Second, future research is needed to examine the longitudinal impacts of events (e.g., dynamic and evolving intervention needs since COVID-19) and their relationship to school counselors' MTSS/MTMDSS beliefs. Both state and district/school site level policy priorities and implementation strategies are likely nested in school counselor belief systems. The degree to which belief about the MTMDSS framework is viable, useful, and/or efficacious for its stakeholders over time is worth investigating and each may impact recruitment, selection, and retention of the present and future school counselor workforce long after the pandemic. Lastly, to be more assured that the USIS instrument captures a full range of school counselor beliefs on the importance of MTMDSS universal supports, it may benefit from some enhancements prior to future deployment, such as: (a) exploring different point configurations of the outcome space, (b) exploring alternatives to Likert-style items that may more effectively draw out variation such as Guttman (1944) items, and (c) exploring alternative IRT measurement models to apply to the USIS survey data, such as unfolding models which have been found to be useful in studies of individual attitudes and preferences (Andrich, 1988; Liu & Chalmers, 2018; Wilson, 2005; Yuan et al., 2022).

Conclusions

This study explored and measured California high school counselor beliefs on the importance of MTMDSS universal supports since COVID-19. Understanding high school counselor beliefs has implications for effective implementation of universal supports, in part, because these beliefs are a proxy for degree of engagement with good practices. Having a reliable instrument that fares well in robust validation protocols aids researchers and evaluators who examine what makes a difference in successful MTMDSS universal supports initiatives. It also can directly aid

practitioners and preparers who value beliefs inventories as part of a process of self-and peer assessment.

Findings from this specific sample reveal high levels of belief in the importance of MTMDSS (Tier 1) universal supports since COVID-19 among California's school counselor population. Future studies should include other states in the U.S. that are engaging in transformational assistance for at-risk students. As multi-tiered supports become increasingly embedded in national educational policy and standards, ongoing research with the USIS instrument can help inform the school counseling profession about factors influencing practitioners' beliefs.

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Conflict of Interest Statement

The authors have no conflicts of interest to disclose.

References

- Adams, R. J., & Khoo, S. T. (1996). ACER Quest: The interactive test analysis system. Australian Council for Educational Research (ACER). <https://research.acer.edu.au/measurement/3/>
- Adams, R. J., Wu, M.L., Cloney, D., Berezner, A., & Wilson, M. (2020). *ACER ConQuest: Generalised item response modelling software* (Version 5.29) [Computer software]. Australian Council for Educational Research. <https://acer.org/au/conquest>
- American Educational Research Association, American Psychological Association, & National Council on Measurement in Education. (2014). *Standards for educational and psychological testing*. American Educational Research Association.
- Ajzen, I. & Fishbein, M. (1980). *Understanding attitudes and predicting social behavior*. Prentice Hall.
- Allison, P. (1999). *Multiple regression: A primer* (1st ed.). Pine Forge Press.
- Allison, P. (2012, September 10). *When can you safely ignore multicollinearity?* Statistical Horizons. Retrieved April 10, 2023, from <https://statisticalhorizons.com/multicollinearity/>
- American Academy of Pediatrics. (2021, October 19). *AAP-AACAP-CHA declaration of a national emergency in child and adolescent mental health*. Retrieved May 2, 2023, from <https://www.aap.org/en/advocacy/child-and-adolescent-healthy-mental-development/aap-aacap-cha-declaration-of-a-national-emergency-in-child-and-adolescent-mental-health/>
- Andrich, D. (1988). The application of an unfolding model of the PIRT type to the measurement of attitude. *Applied Psychological Measurement*, 12(1), 33–51. <https://doi.org/10.1177/014662168801200105>
- American School Counselor Association. (2019). *ASCA national model: A framework for school counseling programs* (4th ed.). American School Counselor Association.
- American School Counselor Association. (2020, December). American School Counselor Association. <https://www.schoolcounselor.org/>
- Aubrey, R. F. (1977). Historical development of guidance and counseling and implications for the future. *Personnel and Guidance Journal*, 55(6), 288–295.

- <https://doi.org/10.1002/j.2164-4918.1977.tb04991.x>
- Azar, K., Lockhart, S. H., Shen, Z., Romanelli, R., Brown, S., Smits, K., & Pressman, A. (2021). *Disparities among racially/ethnically marginalized groups in the COVID-19 pandemic persist regardless of statewide shelter-in-place policies: An analysis from northern California*. Oxford University Press. <https://doi.org/10.1093/aje/kwab191>
- Belser, C. T., Shillingford, M. A., & Joe, J. R. (2016). The ASCA model and a multi-tiered system of supports: A framework to support students of color with problem behavior. *The Professional Counselor*, 6(3), 251–262. <https://doi.org/10.15241/cb.6.3.251>
- Blake, M. K. (2020). Other duties as assigned: The ambiguous role of the high school counselor. *Sociology of Education*, 93(4), 315–330. <https://doi.org/10.1177/0038040720932563>
- Bohanon, H. S., Wu, M.J., Kushki, A., LeVesseur, C., Harms, A., Vera, E., Carlson-Sanei, J., & Shriberg, D. (2021). The role of school improvement planning in the implementation of MTSS in secondary schools. *Preventing School Failure: Alternative Education for Children and Youth*, 65(3), 230–242. <https://doi.org/10.1080/1045988X.2021.1908215>
- Braun, G., Kumm, S., Brown, C., Walte, S., Tejero Hughes, M., & Maggin, D. M. (2018). Living in tier 2: Educators' perceptions of MTSS in urban schools. *International Journal of Inclusive Education*, 24(10), 1114–1128. <https://doi.org/10.1080/13603116.2018.1511758>
- Braun, V., & Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative research in psychology*, 3(2), 77–101. <https://doi.org/10.1191/1478088706qp063oa>
- Bryman, A., & Cramer, D. (2011). *Quantitative data analysis with IBM SPSS 17, 18, & 19: A guide for social scientists* (1st ed.). Routledge.
- California Education Code §49600 (1987 & rev. 2022). <http://leginfo.legislature.ca.gov/>
- California MTSS, Huff, B., Blanchard, S., Berdan Lozano, J., Sarkissyan, T., Fischbacher, L., & Cazares Minero, M. (2021). *Pilot phase 2A participation year 2 executive summary: CA Multi-Tiered System of Support (CA MTSS) pilot program*. UCLA Center for the Transformation of Schools. <https://transformschoools.ucla.edu/research/ca-mtss-pilot-phase-2a-participation-year-2-summary/>
- Campbell, C., & Dahir, C. A. (1997). *The national standards for school counseling programs*. American School Counselor Association.
- California Association of School Counselors. (2020). California Association of School Counselors. <https://schoolcounselor-ca.org/>
- CASC. (2023). California standards for the school counseling profession 2023. California School Counselor Association. <https://irp.cdn-website.com/7b4c483c/files/uploaded/CASC+Standards+2023+FINAL+-+Digital+Copy.pdf>
- Catlin, G., & Epstein, S. (1992). Unforgettable experiences: The relation of life events to basic beliefs about self and world. *Social Cognition*, 10(2), 189–209. <https://doi.org/10.1521/soco.1992.10.2.189>
- California Department of Education. (2022, March 28). *Multi-Tiered System of Supports*. <https://www.cde.ca.gov/ci/cr/ri/>
- Creswell, J. W., & Creswell, J. D. (2018). *Research design: Qualitative, quantitative, and mixed methods approaches* (5th ed.). Sage Publications.
- Cronbach, L. J. (1951). Coefficient alpha and the internal structure of tests. *Psychometrika*, 16(3), 297–334. <https://doi.org/10.1007/BF02310555>
- Dahir, C. A. (2004). Supporting a nation of learners: The role of school counseling in educational reform. *Journal of Counseling & Development*, 82(3), 344–353.

- <https://doi.org/10.1002/j.1556-6678.2004.tb00320.x>
- Downey, D. B., von Hippel, P. T., & Broh, B. A. (2004). Are schools the great equalizer? Cognitive inequality during the summer months and the school year. *American Sociological Review*, 69(5), 613–635. <https://doi.org/10.1177/000312240406900501>
- Edwin, M., & Bahr, M.W. (2023). Multi-Tiered System of Supports—Interventionist Beliefs Scale: Development and initial validation with school counselors. *Journal of Psychoeducational Assessment*, 417(7), 748–763. <https://doi.org/10.1177/07342829231184293>.
- Epstein, S. (2003). Cognitive experiential self-theory of personality. T. Millon & M. Lerner (Eds.), *Handbook of psychology: Personality and social psychology* (5th ed., p. 159-184). John Wiley & Sons.
- Festinger, L. (1957). *A theory of cognitive dissonance*. Stanford University Press.
- Fishbein, M., & Ajzen, I. (1975). *Beliefs, attitudes, intentions, and behavior*. Addison-Wesley.
- Gazmararian, J., Weingart, R., Campbell, K., Cronin, T., & Ashta, J. (2021). Impact of COVID-19 pandemic on the mental health of students from 2 semi-rural high schools in Georgia. *Journal of School Health*, 91(5), 356–369. <https://doi.org/10.1111/josh.13007>
- Geiger, S. N., & Oehrtman, J. P. (2020). School counselors and the school leadership team. *Professional School Counseling*, 23(1), 1-9. <https://doi.org/10.1177/2156759X20903566>
- Gladding, S. T. (2013). *Counseling: A comprehensive profession* (7th ed.). Pearson.
- Goldhaber, D., Kane, T., McEachin, A., Morton, E., Patterson, T., & Staiger, D. (2022). *The consequences of remote and hybrid instruction during the pandemic* (Working Paper No. 30010). National Bureau of Economic Research. <https://doi.org/10.3386/w30010>
- Goodman-Scott, E. C., Edirmanasinghe, N. A., Moe, J., & Boulden, R. (2022). Assessing the influence of multi-tiered systems of support on school counselors' perceptions of school counseling activities: Results of a national study. *Professional School Counseling*, 26(1), 1–10. <https://doi.org/10.1177/2156759X221138232>
- Guttman, L., (1944). A basis for scaling qualitative data. *American Sociological Review*, 9(2), 139–150. <https://doi.org/10.2307/2086306>
- Hatch, T., & Chen-Hayes, S. F. (2008). School counselor beliefs about ASCA national model school counseling components using the SCPCS. *Professional School Counseling*, 12(1), 34–42. <https://doi.org/10.1177/2156759X0801200104>
- Hatch, T., Poynton, T. A., & Perusse, R. (2015). Comparison findings of school counselor beliefs about ASCA national model school counseling program components using the SCPCS. *SAGE Open*, 1–10. <https://doi.org/10.1177/2158244015579071>
- Hatch, T., Triplett, W., Duarte, D., & Gomez, V. (2019). *Hatching results for secondary school counseling: Implementing core curriculum, individual student planning, and other tier one activities*. Corwin.
- Jack, R., Halloran, C., Okun, J. C., & Oster, E. (2021). *Pandemic schooling mode and student test scores: Evidence from US states* (NBER Working Paper No. 29497). <https://doi.org/10.3386/w29497>
- Johnston, R., Jones, K., & Manley, D. (2018). Confounding and collinearity in regression analysis: A cautionary tale and an alternative procedure, illustrated by studies of British voting behaviour. *Quality & Quantity*, 52, 1957–1976. <https://doi.org/10.1007/s11135-017-0584-6>
- Knabe, A. P. (2012). *Applying Ajzen's theory of planned behavior to a study of online course adoption in public relations education* (186) [Doctoral dissertation, Marquette

- University]. e-Publications@Marquette.
https://epublications.marquette.edu/dissertations_mu/186
- Lambie, G. W., & Williamson, L. L. (2004). The challenge to change from guidance counseling to professional counseling: A historical proposition. *Professional School Counseling, 8*(2), 124–131. <https://www.jstor.org/stable/42732614>
- Largent, E. A., Persad, G., Mello, M. M., Wenner, D. M., Kramer, D. B., Edmonds, B. T., & Peek, M. (2021). Incorporating health equity into COVID-19 reopening plans: Policy experimentation in California. *AM J Public Health, 111*(8), 1481–1488.
<https://doi.org/10.2105/AJPH.2021.306263>
- 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/hhc-x195>
- Liu, C.-W., & Chalmers, R. P. (2018). Fitting item response unfolding models to Likert-scale data using mirt in R. *PLoS ONE, 13*(5). <https://doi.org/10.1371/journal.pone.0196292>
- Minkos, M. L., & Gelbar, N. W. (2020). Considerations for educators in supporting student learning in the midst of COVID-19. *Psychology in the Schools, 58*(2), 416–426.
<https://doi.org/10.1002/pits.22454>
- Murata, S., Rezeppa, T., Thoma, B., Marengo, L., Krancevich, K., Chiyka, E., Hayes, B., Goodfriend, E., Deal, M., Zhong, Y., Brummit, B., Coury, T., Riston, S., Brent, D. A., & Melhem, N. M. (2021). The psychiatric sequelae of the COVID-19 pandemic in adolescents, adults, and health care workers. *Depression and Anxiety, 38*(2), 233–246.
<https://doi.org/10.1002/da.23120>
- National Research Council. (2001). *Knowing what students know: The science and design of educational assessment*. National Academy Press. <https://doi.org/10.17226/10019>
- Orange County Department of Education. (2020). *Guide to understanding California MTSS*. <https://ocde.us/MTSS/Documents/CA%20MTSS%20Guide.pdf>
- Olsen, J., Parikh Foxx, S., & Flowers, C. (2020). A confirmatory factor analysis of the school counselor knowledge and skills survey for multi-tiered systems of support. *The Professional Counselor, 10*(3), 376–392. <https://doi.org/10.15241/jo.10.3.376>
- Paek, I. (2002). *Investigations of differential item functioning: Comparisons among approaches, and extension to a multidimensional context* (3082356) [Doctoral dissertation, University of California, Berkeley]. ProQuest. <https://escholarship.org/uc/item/3kq7v1rr>
- Patton, M. Q. (2015). *Qualitative research & evaluation methods: Integrating theory and practice*. Sage.
- Patrikakou, E., Ockerman, M. S., & Feiker Hollenbeck, A. (2016). Needs and contradictions of a changing field: Evidence from a national response to intervention implementation study. *The Professional Counselor, 6*(3), 233–250. <https://doi.org/10.15241/ep.6.3.233>
- Pérusse, R., Goodnough, G. E., Donegan, J., & Jones, C. (2004). Perceptions of school counselors and school principals about the national standards for school counseling programs and the transforming school counseling initiative. *Professional School Counseling, 7*(3), 152–161. <https://www.jstor.org/stable/42732557>
- Sailor, W., Skrtic, T. M., Cohn, M., & Olmstead, C. (2021). Preparing teacher educators for statewide scale-up of multi-tiered system of support (MTSS). *Teacher Education and Special Education, 44*(1), 24–41. <https://doi.org/10.1177/0888406420938035>
- Savitz-Romer, M., Rowan-Kenyon, H. T., Nicola, T. P., Alexander, E., & Carroll, S. (2021).

- When the kids are not alright: School counseling in the time of COVID-19. *AERA Open*, 7(1), 1–16. <https://doi.org/10.1177/23328584211033600>
- Schweiger, W. K., Henderson, D. A., McCaskill, K., Clawson, T. W., & Collins, D. R. (Eds.). (2007). *Counselor preparation: Programs, faculty, trends* (13th ed.). Routledge.
- Shertzer, B., & Stone, S. C. (1981). *Fundamentals of guidance* (4th ed.). Houghton Mifflin.
- Sink, C. A., & Yillik-Downer, A. (2001). School counselors' perceptions of comprehensive guidance programs: A national survey. *Professional School Counseling*, 4(4), 278–288. <https://www.jstor.org/stable/42732267>
- Sullivan, A., Miller, F., McKevevett, N., Muldrew, A., Hansen-Burke, A., & Weeks, M. (2020). Leveraging MTSS to advance, not suppress, COVID-related equity issues. *Communiqué*, 49(1), 1–29. <https://link.gale.com/apps/doc/A635067587/AONE?u=anon~869834d1&sid=googleScholar&xid=55cf1340>

Table 1
Survey Items for USIS, Part 1: High School Counselor Beliefs about the Importance of
(Tier 1) Universal Supports

#	Item	Facet
Q1	A districtwide high school counseling curriculum focused on building academic skills delivered to all students is essential since COVID-19.	CC
Q2	A districtwide high school counseling curriculum focused on graduation requirements delivered to all students is essential since COVID-19.	CC
Q3	A districtwide high school counseling curriculum focused on exploring college and career possibilities delivered to all students is essential since COVID-19.	CC
Q4	A districtwide high school counseling curriculum focused on college admissions preparation delivered to all students is essential since COVID-19.	CC
Q5	A districtwide high school counseling curriculum focused on building social skills delivered to all students is essential since COVID-19.	CC
Q6	A districtwide high school counseling curriculum focused on mental health and well-being delivered to all students is essential since COVID-19.	CC
Q7	Individualized 4-year academic planning for all students is essential since COVID-19.	IP
Q8	Individualized course selection planning for all students is essential since COVID-19.	IP
Q9	Individualized postsecondary planning for all students is essential since COVID-19.	IP
Q10	Individualized academic strengths and interests identification is essential since COVID-19.	IP
Q11	Individualized goal setting for all students is essential since COVID-19.	IP
Q12	District/schoolwide transition-to-high school events are essential since COVID-19.	SE
Q13	District/schoolwide postsecondary pathways events are essential since COVID-19.	SE
Q14	District/schoolwide college fairs are essential since COVID-19.	SE
Q15	District/schoolwide mental health awareness events are essential since COVID-19.	SE
Q16	District/schoolwide cultural diversity education events are essential since COVID-19.	SE
Q17	District/schoolwide parent education events focused on academic support resources are essential since COVID-19.	PE
Q18	District/schoolwide parent education events focused on postsecondary pathways are essential since COVID-19.	PE
Q19	District/schoolwide parent education events focused on college planning are essential since COVID-19.	PE
Q20	District/schoolwide parent education events focused on social-emotional development are essential since COVID-19.	PE
Q21	District/schoolwide parent education events focused on mental health support resources are essential since COVID-19.	PE

Note. Facets: Counseling Curriculum, Individualized Planning, Schoolwide Events, Parent Events)
 (Outcome Space: Strongly Agree, Agree, Neutral, Disagree, Strongly Disagree)

Table 2
Survey Participant Demographics

Participant Demographic	Frequency	Percent
Gender		
Female	79	78.2%
Male	22	21.8%
Race/Ethnicity		
Asian	1	1.0%
Black/African American	3	3.0%
Hispanic or Latino/a/x	37	36.6%
White	54	53.5%
Prefer to self-describe: Italian American	1	1.0%
Prefer to self-describe: Middle Eastern	1	1.0%
Prefer not to state	4	4.0%
Age		
Younger than 30	6	5.9%
30–39	32	31.7%
40–49	34	33.7%
50–59	20	19.8%
60–69	7	6.9%
70 or older	1	1.0%
Prefer not to state	1	1.0%
Ever employed as a school counselor in CA		
Yes	101	100.0%
Currently employed as a school counselor in CA		
Yes	101	100.0%
Years worked as a school counselor		
Less than 1 year	6	5.9%
1–4 years	17	16.8%
5–9 years	20	19.8%
10–19 years	37	36.6%
20 years or more	21	20.7%
Highest degree earned		
Bachelor's degree	1	1.0%
Master's degree	99	98.0%
Ed.D. or Ph.D.	1	1.0%
Graduate program CACREP-accredited		
Yes	55	54.5%
No	12	11.9%
I don't know	34	33.7%
ASCA membership		
Yes	67	66.3%
No	34	33.7%
CASC membership		
Yes	54	53.5%
No	47	46.5%

Table 3
Survey Participant School Community Demographics

Participant School Community Demographics	Frequency	Percent
County/Community Type		
Rural	19	18.6%
Suburban	60	58.8%
Urban	23	22.5%
Type of High School		
Comprehensive public high school	90	89.1%
Charter high school	3	3.0%
Continuation or alternative public high school	5	5.0%
Private high school	2	2.0%
Other: COSA (Counselor on special assignment)	1	1.0%
Student Enrollment of School		
300 or fewer	3	3.0%
301-600	6	5.9%
601-1,000	6	5.9%
1,001-2,000	37	36.6%
2,001 or more	49	48.5%
Students Qualify for Free and Reduced Lunch		
10% or less	11	10.8%
11% - 25%	17	16.7%
26% - 50%	23	22.5%
51% - 75%	19	18.6%
More than 75%	32	31.4%
Students in Foster Care		
Less than 1%	45	45.0%
1% - 5%	43	43.0%
6% - 10%	11	11.0%
11% - 25%	1	1.0%
Students Experiencing Homelessness		
Less than 1%	31	31.0%
1% - 5%	50	50.0%
6% - 10%	13	13.0%
11% - 25%	6	6.0%
Students in ELD		
10% or less	40	39.6%
11% - 25%	39	38.6%
26% - 50%	12	11.9%
51% - 75%	9	8.9%
More than 75%	1	1.0%
Student-to-Counselor Ratio		
250-to-1 or lower	9	9.0%
251-to-1 – 609-to-1	87	87.0%
610-to-1 or higher	4	4.0%

Table 4**Summary of Quantitative Findings for USIS Part 1***Facet of Practice 1: School Counseling Curriculum*

Item	Strongly Disagree (0)	Disagree (1)	Neutral (2)	Agree (3)	Strongly Agree (4)	Missing Values	Median
Q1	0 0%	5 4.4%	8 7.1%	31 27.4%	69 61.1%	0 0%	4.0
Q2	0 0%	0 0%	8 7.1%	30 26.6%	75 66.4%	0 0%	4.0
Q3	0 0%	0 0%	5 4.4%	25 22.1%	83 73.5%	0 0%	4.0
Q4	0 0%	3 2.7%	9 8.0%	48 42.5%	53 46.9%	0 0%	3.0
Q5	0 0%	3 2.7%	11 9.7%	26 23.0%	73 64.6%	0 0%	4.0
Q6	0 0%	1 .9%	4 3.5%	21 18.6%	87 77.0%	0 0%	4.0

Facet of Practice 2: Individualized Planning

Item	Strongly Disagree (0)	Disagree (1)	Neutral (2)	Agree (3)	Strongly Agree (4)	Missing Values	Median
Q7	0 0%	6 5.3%	9 8.0%	33 29.2%	64 56.6%	1 .9%	4.0
Q8	0 0%	4 3.5%	12 10.6%	36 31.9%	60 53.1%	1 .9%	4.0
Q9	0 0%	0 0%	8 7.1%	48 42.5%	54 47.8%	3 2.7%	3.0
Q10	0 0%	6 5.3%	12 10.6%	46 40.7%	46 40.7%	3 2.7%	3.0
Q11	0 0%	1 .9%	15 13.3%	45 39.8%	48 42.5%	4 3.5%	3.0

Table 4 (Continued)*Facet of Practice 3: Schoolwide Events*

Item	Strongly Disagree (0)	Disagree (1)	Neutral (2)	Agree (3)	Strongly Agree (4)	Missing Values	Median
Q12	0 0%	0 0%	9 8.0%	44 38.9%	54 47.8%	6 5.3%	4.0
Q13	0 0%	1 .9%	8 7.1%	49 43.4%	49 43.4%	6 5.3%	3.0
Q14	0 0%	4 3.5%	15 13.3%	48 42.5%	40 35.4%	6 5.3%	3.0
Q15	0 0%	0 0%	3 2.7%	35 31.0%	68 60.2%	7 6.2%	4.0
Q16	0 0%	4 3.5%	5 4.4%	37 32.7%	58 51.3%	9 8.0%	4.0

Facet of Practice 4: Parent Education Events

Item	Strongly Disagree (0)	Disagree (1)	Neutral (2)	Agree (3)	Strongly Agree (4)	Missing Values	Median
Q17	0 0%	2 1.8%	5 4.4%	41 36.3%	56 49.6%	9 8.0%	4.0
Q18	0 0%	3 2.7%	8 7.1%	44 38.9%	48 42.5%	10 8.8%	3.0
Q19	0 0%	4 3.5%	11 9.7%	45 39.8%	42 37.2%	11 9.7%	3.0
Q20	0 0%	1 .9%	9 8.0%	37 32.7%	55 48.7%	11 9.7%	4.0
Q21	0 0%	0 0%	5 4.4%	37 32.7%	60 53.1%	11 9.7%	4.0

Table 5**Effect of Explanatory Variables on USIS Scale Scores for Regression Model 2**

Variable	Unstandardize d Regression Coefficient (B)	Standar d Error (B)	Standardize d Regression Coefficient Beta	t	Sig.
(Constant USIS Scale Score)	.950	.530		1.793	.076
Urbanicity of school community	.717	.413	.188	1.737	.086
Percentage of students qualify free/reduced lunch	-.049	.362	-.015	-.134	.894
Years worked as a school counselor	-.017	.511	-.004	-.033	.974
CASC membership	.105	.354	.033	.295	.769
Gender identity of school counselor	.440	.418	.114	1.053	.295
Ethnicity/race identity of school counselor	.017	.353	.005	.048	.962
Age of school counselor	.041	.436	.012	.093	.926

Table 6**Item Parameter Estimates, Standard Errors, and Mean Square Weighted Fit and t Statistics for the USIS Scale**

Items	<u>Variables</u>		<u>Weighted Fit</u>		
	Estimate	Error	Infit Mean Square	Confidence Interval	Infit t
Q1	0.012	0.180	1.05	(0.73, 1.27)	0.4
Q2	-0.396	0.213	1.15	(0.71, 1.29)	1.0
Q3	-0.823	0.258	0.94	(0.68, 1.32)	-0.4
Q4	0.251	0.188	1.14	(0.75, 1.25)	1.0
Q5	-0.007	0.176	1.12	(0.73, 1.27)	0.8
Q6	-0.891	0.260	1.06	(0.65, 1.35)	0.4
Q7	0.185	0.174	1.22	(0.74, 1.26)	1.6
Q8	0.300	0.172	1.09	(0.75, 1.25)	0.7
Q9	-0.047	0.216	0.96	(0.74, 1.26)	-0.3
Q10	0.647	0.173	0.89	(0.75, 1.25)	-0.9
Q11	0.523	0.177	1.08	(0.75, 1.25)	0.6
Q12	0.013	0.208	1.05	(0.74, 1.26)	0.4
Q13	0.119	0.209	0.88	(0.74, 1.26)	-0.9
Q14	0.820	0.175	0.99	(0.75, 1.25)	-0.0
Q15	-0.906	0.323	0.98	(0.73, 1.27)	-0.1
Q16	-0.070	0.207	0.96	(0.73, 1.27)	-0.2
Q17	-0.186	0.226	0.95	(0.73, 1.27)	-0.3
Q18	0.292	0.197	0.86	(0.74, 1.26)	-1.1
Q19	0.611	0.183	0.88	(0.74, 1.26)	-0.9
Q20	0.043	0.201	1.03	(0.73, 1.27)	0.3
Q21	-0.489*	0.259	0.97	(0.72, 1.28)	-0.1

Table 7
Internal Consistency Reliability Coefficients

Scale	Coefficient Values I	
	Cronbach's alpha	Person Separation
USIS	0.84	0.847

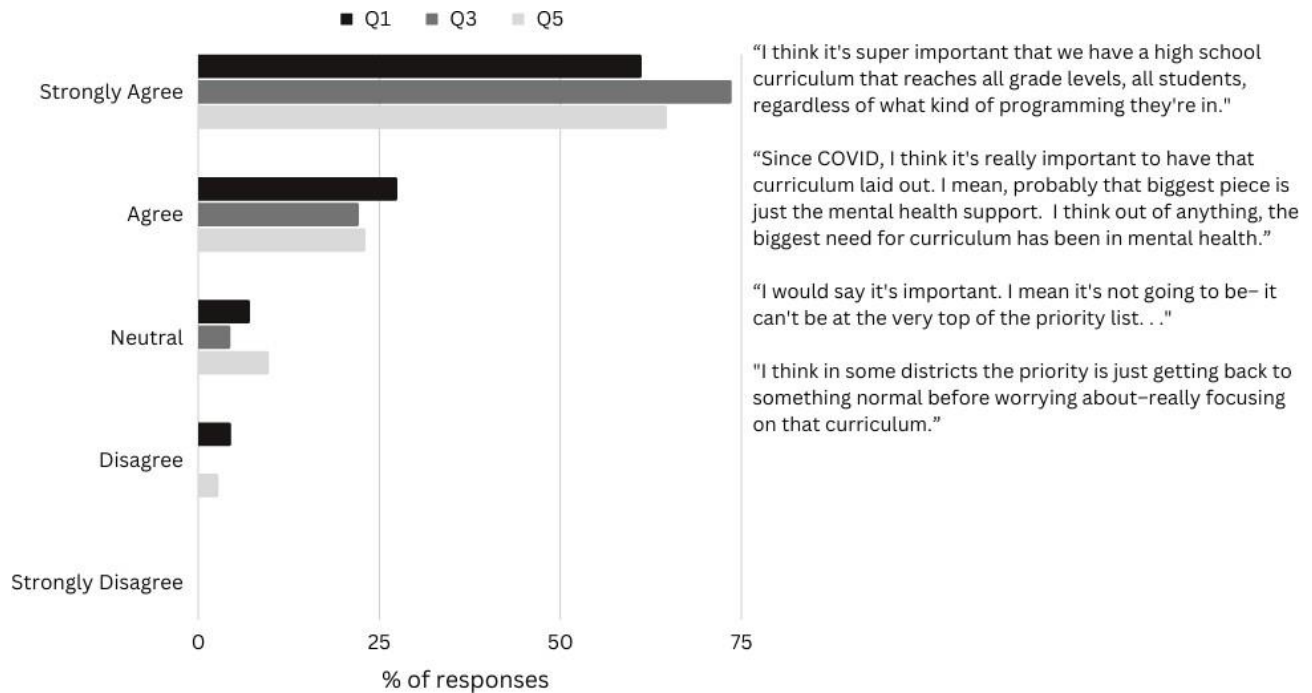


Figure 1

Side-by-Side Analysis of the Importance of School Counseling Curriculum Delivered to All Students

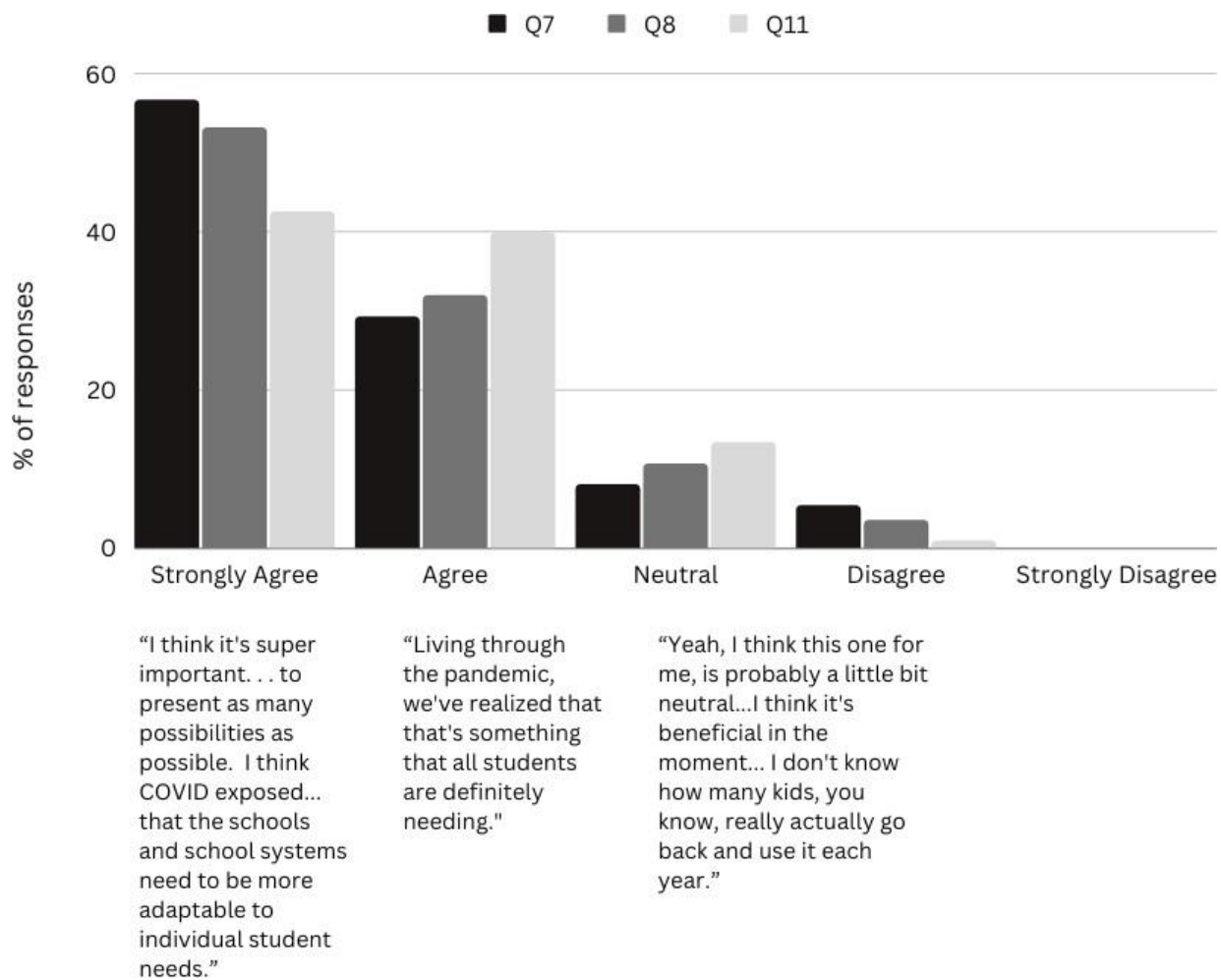


Figure 2

Side-by-Side Analysis of the Importance of Individualized Student Planning Delivered to All Students

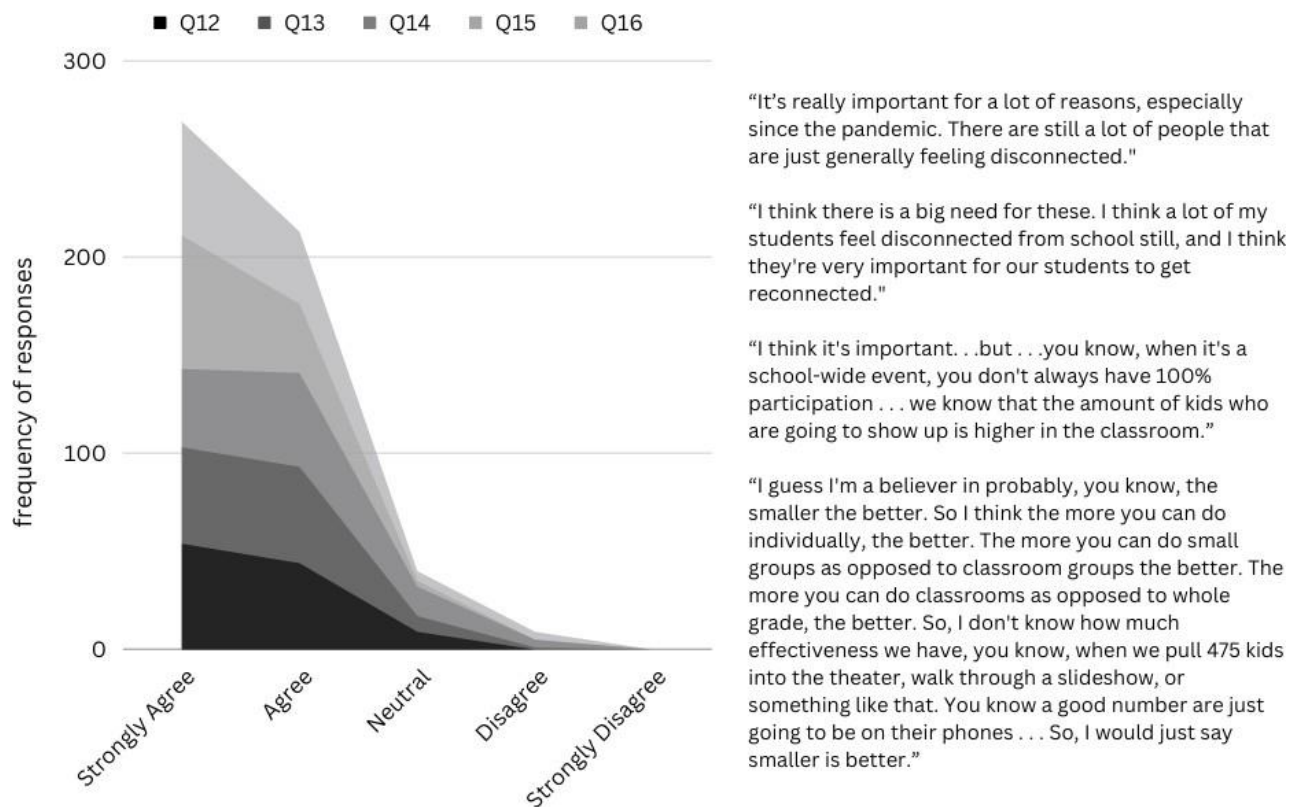
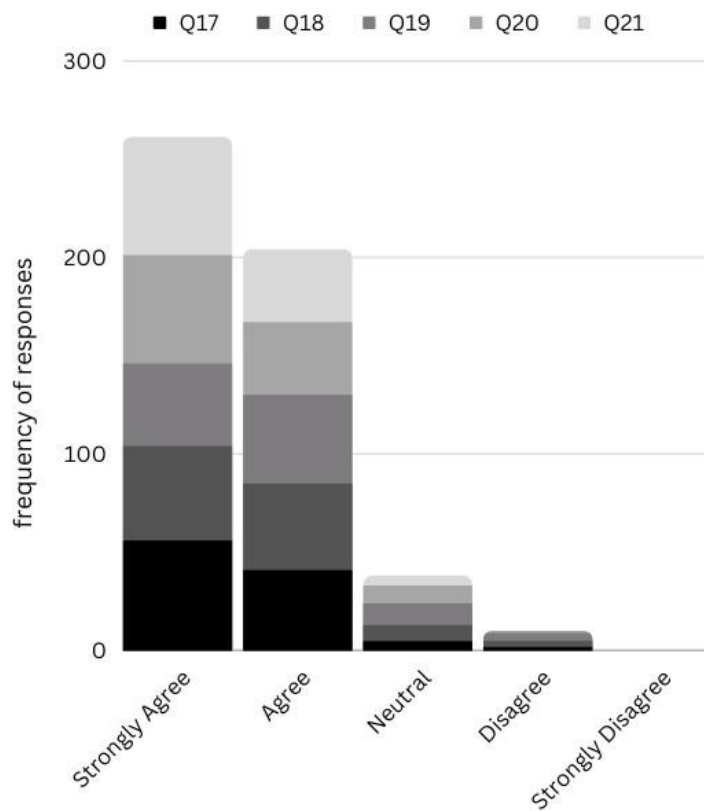


Figure 3

Side-by-Side Analysis of the Importance of Schoolwide Events Delivered to All Students



"Absolutely, the economic disparity [makes these events important]. We have a really interesting population where half of my families are wealthy and the other half are struggling to get by. . . And these events are in some ways an equalizer. . . That is absolutely needed. Always, and especially now, since COVID."

"It's important . . . parents are such a valuable resource, and in order to, you know, just get to a multi-tiered system of support, teachers and counselors— we can't do anything without parent buy-in. And really, it's a beautiful thing when we have all three factors or stakeholders coming in together to support the student. Because if we're all on the same page, it's like the student can't fall through the cracks."

"I think those needs have definitely increased. The hard part is if we try to move away from that [college focus] as a counseling group, and do more in that [wellness, social-emotional] space we get a little bit of heat and push back . . . So it's tough to, you know, work around that sometimes."

"I definitely see the value and the importance of it. I just don't know how important parents think they are in the scheme of everything else they're dealing with during or since COVID. I just don't know."

Figure 4

Side-by-Side Analysis of the Importance of Parent Education Events

Strongly Believe/ Believe	School Counseling Curriculum <i>"I think what makes it really important is making sure that all students are getting the information. All students deserve access to grade-specific information, and the best and most comprehensive way to get it is to provide it through classroom curriculum. Otherwise, you risk missing some students, some groups. That's an important part of the MTSS Tier 1 process, the lessons that you provide."</i> Individualized Planning <i>"Living through the pandemic, we've realized that that's something that all students are definitely needing. We are getting so many questions, just a lack of understanding of"</i>
Neutral	School Counseling Curriculum <i>"I would say it's important. I mean it's not going to be— it can't be at the very top of the priority list, because you just really don't have time to put all your resources into that, you know, because of the emergency room type setting here."</i> Individualized Planning <i>"Yeah, I think this one for me, is probably a little bit neutral . . . I would say it's aspirational. I think it's beneficial in the moment, because it gets them to think about planning, not just for the sophomore year, but also options that will be available to them as juniors and seniors. The challenge for us has been coming back to it. We really have not figured out a way, or you know, a method for continually returning to that with each scheduling cycle. So it's useful if they go back to it. I don't know how many kids, you know, really actually go back and use it each year."</i> Schoolwide Events <i>"I think it's important. . .because obviously the information that we're sharing we feel is important. . .you know, when it's a school-wide event, you don't always have 100% participation . . .So that's why I think we've gone to the length of—we go into the classrooms so that way we can reach them. And then there's way, way less students that don't get it because we are able to do that. And so that's kind of been like something that we've done, as opposed to 'okay, we're gonna have these workshops'. I mean, we still have open workshops and things like that. But we know that the amount of kids who are going to show up is higher in the classroom."</i> Parent Education Events <i>"The turmoil or whatever you want to call it—I think those needs have definitely increased. The hard part is if we try to move away from that [college focus] as a counseling group, and do more in that [wellness, social-emotional] space and less of you know, college info nights, and come learn more about the SAT and ACT and test optional and blah blah blah, we get a little bit of heat and push back of like, 'Stay in your lane. . . that's the information we want.' So it's tough to, you know, work around that sometimes."</i>

Figure 5

High School Counselor Range of Beliefs in Importance of Universal Supports Facets of Practice

Skeptical	School Counseling Curriculum <i>"I don't know if it's been long enough for us to really be able to think about all those things. I think we're still in this stage of like trying to get back to something normal. I think last year, being our first year back on campus, it was just kind of like a "what are we doing?" type of thing. So it's definitely important but like, probably like a 5 out of 10 right now. It's definitely important, but I don't know how that's really been the priority. I think in some districts the priority is just getting back to something normal before worrying about—really focusing on that curriculum."</i> Individualized Planning None Schoolwide Events <i>"I guess I'm a believer in probably, you know, the smaller the better. I think the more you can do individually, the better. The more you can do small groups as opposed to classroom groups the better. The more you can do classroom as opposed to whole grade, the better. I don't know how much effectiveness we have, you know, when we pull 475 kids into the theater, walk through a slideshow, or something like that. You know a good number are just going to be on their phones. They're not necessarily going to be processing or gaining from the instruction or the service that we're providing. So I would just say smaller is better."</i> Parent Education Events <i>"I would say, yes, it's important. It's important, but at the same time I feel like it's really only the parents who are involved or privileged, and the students that have parents who are involved that attend these things right now. And so, I don't know that it's really marketing itself for students whose parents maybe have a language barrier or maybe they work 2 or 3 jobs, and they're just not able to spend that time like some other parents are . . . Also, this is the first year back [since COVID] that I've done parent events, and a lot of people still don't want to go around large crowds. So we're seeing very small numbers of parents when we hold our events still. So I think, yeah, it is important as a counselor. We need to get out there, but I think people are still a little bit afraid or they have a lot going on . . . I definitely see the value and the importance of it. I just don't know how important parents think they are in the scheme of everything else they're dealing with during or since COVID. I just don't know."</i>
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Figure 5 (Continued)

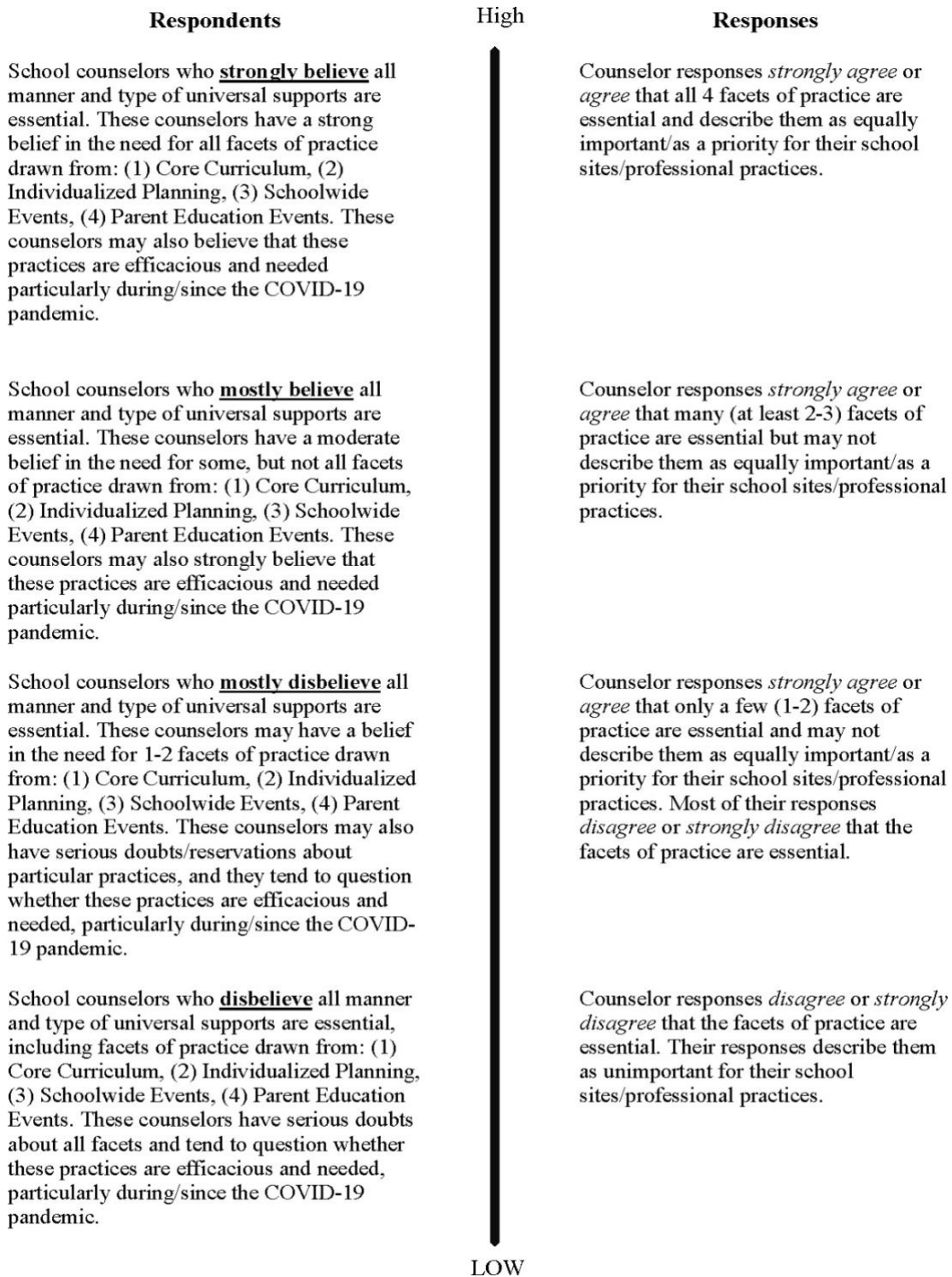


Figure 6

Construct Map of school counselors' range of beliefs in the importance of universal supports

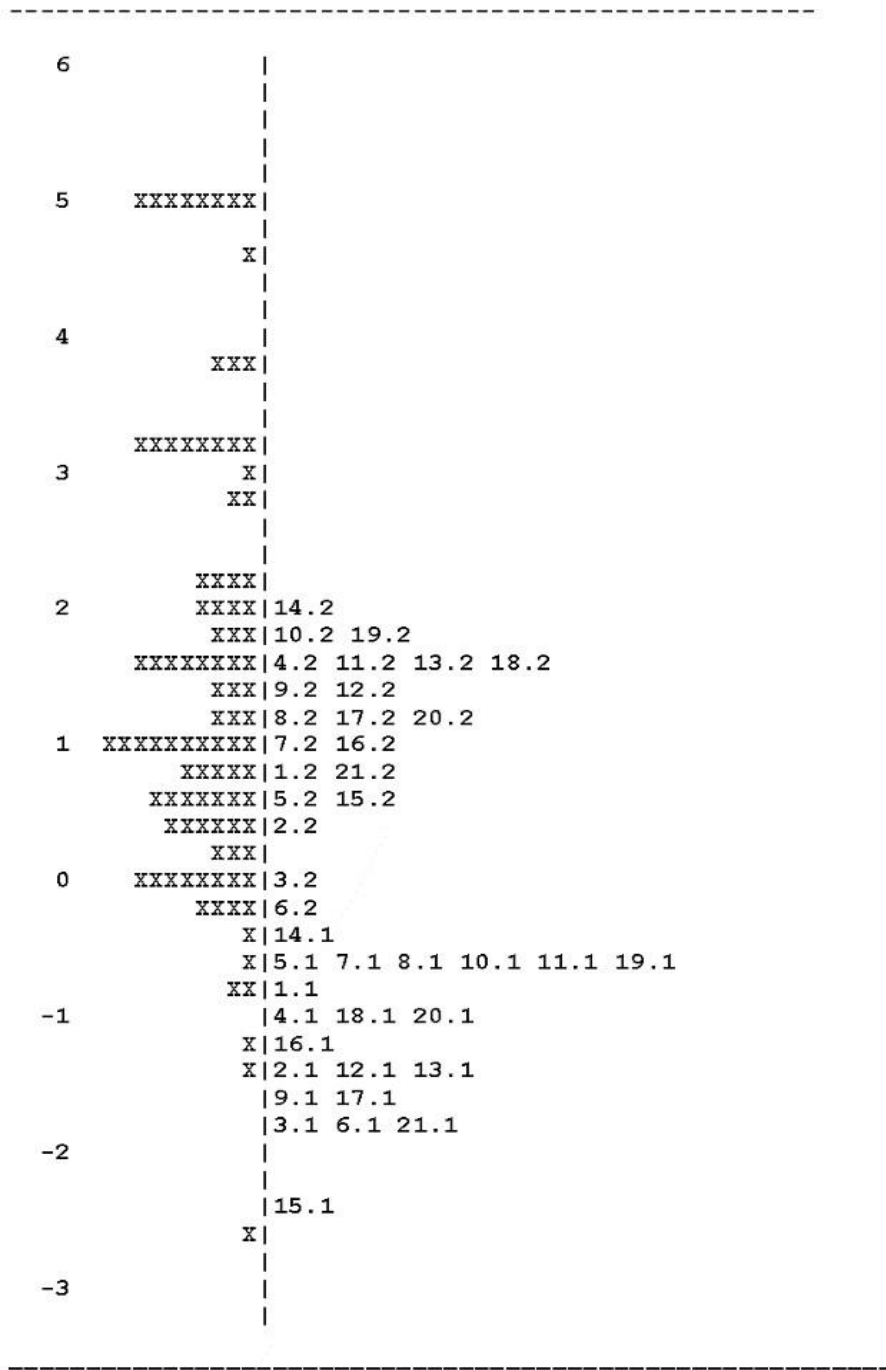


Figure 7

Wright Map of Person Proficiencies and Item Thresholds for the USIS Scale

Each X on the Wright map represents 1.2 cases

Intersectionality of Race and Disability: The School Counselors' Role in Policy Reformation

Jenna M. Alvarez
Miami University

Rachel Saunders
Greenville County School District

Vanessa Sinclair
Miami University

Stephanie Smith-Durkin
Old Dominion University

Emily Goodman-Scott
Old Dominion University

The United States K-12 education system is riddled with inequities within the intersection of race and disabilities; relatedly, the school counseling literature also demonstrates a similar gap in the literature. As a result, through three case illustrations we highlight the unique experiences of historically marginalized students of color with disabilities, we illustrate the multiplex intersection of race and disability and how a school counselor can utilize leadership, advocacy, and social justice for systemic change. To demonstrate how school counselors can drive change, we include three cases which are structured around the ADDRESSING framework (Hays, 2022). Further, we use this model to support school counselors in systematically considering the complexities of identity, overlapping cultural influences, and the connections to practice. These case illustrations demonstrate school counselors' advocacy to understand and decrease oppressive policies and increase toward culturally affirming practices and access.

Keywords: school counselors, disability, intersection, historically marginalized students

Intersectionality of Race and Disability: The School Counselors' Role in Policy Reformation

The role of a school counselor involves advocacy, social justice, and systemic change to remove barriers for all students (American School Counselor Association [ASCA], 2022a). This includes addressing the unique needs of students of color with disabilities (SWDs), thereby ensuring culturally affirming practices and educational access. To aid school counselors in fulfilling this responsibility, this article first focuses on explaining the ADDRESSING framework (i.e., a model used to understand the complexities of membership, the intersection of majority and historically

marginalized membership, and the connections to practice) (Hays, 2022, 2024). According to Hays (2024), the ADDRESSING framework can be applied to a variety of settings such as a psychology training clinic (Lake et al., 2022), clinical practice related to body size (Brennan, 2018), and pertaining to the impact on therapeutic relationship (Murad-Martinez, 2022). Since the ADDRESSING framework is primarily rooted in clinical counseling psychology practice with no known application to the K-12 educational setting, we incorporate the ASCA National Model (2019a). Next, we discuss how overlapping systems of oppression can affect students' educational pursuits and success, based on students' intersecting identities. Specifically, we define intersectionality generally; then, we discuss students with disabilities (SWDs) and historically marginalized students of color through a lens of intersectionality. Then we discuss the role of school counselors in supporting students of Color with Disabilities. In the rest of this paper, we use the ADDRESSING framework to help school counselors address systemic barriers and intersectionality in educational settings. We present three unique case illustrations that focus on policy, demonstrating how school counselors can create systemic change to support students of color with disabilities using this framework. Finally, we discuss implications for educational systems, including policy and advocacy to support school counselors' work in removing barriers for all students.

The ADDRESSING Framework

The ADDRESSING framework (Hays, 2022) is a model for examining the whole person (counselor and/or client) to understand the interaction of power and marginalization, or what Hays refers to as "majority and minority membership," among cultures or persons' identities. This framework aligns with the theory of intersectionality by positioning identities as complex, and acknowledging that one individual possesses multiple identities that interact or compound. Because the theory of intersectionality acknowledges the overlapping systems of oppression, power, privilege, and politics, the ADDRESSING framework serves as a vehicle or stepping stone for school counselors to understand the systemic oppressive forces impacting underrepresented groups. Further, the ADDRESSING framework also aligns with the MSJCC, yet expands on this previous approach by providing practical, concrete steps for school counseling implementation, which, to our knowledge, is novel and needed within the literature.

Each of the ten letters of the ADDRESSING framework stands for an identity in which an individual could hold majority or historically marginalized membership. The two "Ds" within the ADDRESSING framework focus on **D**evelopmental disability and **D**isability acquired. The "E" within the framework focuses on **E**thnicity and Racial identity. The other letters highlight cultural characteristics of **A**ge and generational influence, **R**eligion and spirituality, **S**ocioeconomic status, **S**exual orientation, **I**ndigenous heritage, **N**ational origin, and **G**ender. The ADDRESSING framework is a practitioner-oriented framework that conceptualizes multicultural work in two broad categories: (1) personal work and (2) interpersonal work (Hays, 2022).

To use the ADDRESSING framework, first, a school counselor needs to be aware of their own identities, beliefs, and commit to personal work. This begins with understanding the effects of cultural influences on their own beliefs, thinking, behavior, and worldview. In her book, *Addressing Cultural Complexities in Counseling and Clinical Practice: An Intersectional Approach*, Hays (2022) encourages counselors to start by recognizing the areas in which they are a member of privileged groups and to become more aware of the ways in which those identities

may limit their knowledge and experiences. It is important for school counselors to work through the ADDRESSING acronym to reflect on their own identities and aspects of their group membership that might hold power and privilege or that might be historically marginalized and oppressed, as this may impact their work with students.

Secondly, school counselors need to commit to interpersonal work. To avoid inaccurate generalizations based on someone's physical appearance, the ADDRESSING framework helps school counselors call attention to multiple identities and contexts interpersonally (i.e., between themselves and students, families, staff, community members, etc). School counselors need to be more than just aware of their own identities, but understand the identities their students hold as well. With increased self-awareness and a better understanding of the student's worldview, a school counselor can advocate for the student to create a more equitable school environment through policy reform.

Additionally, it has been suggested that because the ADDRESSING framework focuses on individual specific identities, the model lacks attention to intersections of identities (Chin et al., 2019). However, when we apply the theory of intersectionality as the foundation, these ten letters within the model can help school counselors understand underrepresented groups and oppressive forces -- not just the identities that are present, but how oppressive forces might impact those identities and the corresponding interpersonal dynamics between individuals and settings. Through interpersonal work, school counselors can better understand how the intersections of identities impact their students at the individual and interpersonal levels. This is especially important in the school setting, as school is a microcosm of society. By utilizing the ADDRESSING framework, from a foundationally lens of intersectionality, our goal of this paper is illuminate ways school counselors can take an active role to recognize and acknowledge their own identities (personal work) and those of their students of color with disabilities (interpersonal work) to advocate and drive policy change.

Intersectionality of Student Race and Disability

The term "intersectionality" describes how two or more identities, such as race, ability, language, and socioeconomic class, intersect and overlap to create individuals with unique experiences (Crenshaw, 1989). However, the theory of intersectionality is not just about identity at the individual or interpersonal level; it also focuses on overlapping systems of oppression, power, privilege, and politics (Cho et al., 2013; Crenshaw, 1989; Mayes & Moore, 2016). Given the long history of systemic racism and educational oppression permeating United States (U.S.) public education, school environments continue to operate in ways that are strategically harmful to students of color (Holcomb-McCoy, 2022; Love, 2019; Mayes & Byrd, 2022). For example, school policies use as zero tolerance policies often still perpetuate these harmful practices creating opportunity gaps for students. In 2021, approximately 15% of all students enrolled in America's schools identified as Black; 28.5% were Hispanic/Latinx; and 1% as American Indian/Indigenous Persons (National Center for Education Statistics [NCES], 2023). This demonstrates a near majority of students of color in America's schools. As one of the education systems' first responders, it is imperative that school counselors recognize and address bias, racism, and discrimination through interventions, advocacy, and policy reformation. This includes the overrepresentation of students from racially marginalized backgrounds in special education programs (Hines et al., 2021).

Black and Brown students who are identified as needing special education services face

unique challenges and barriers due to their belonging to more than one marginalized group. Racism and ableism contribute to overly oppressive educational environments for students of color with disabilities. Schools, through curriculum and behavioral norms, center White, able-bodied students, leaving students of color with disabilities pushed well beyond the margins (Hines et al., 2021). Methods utilized to assess and identify students for special education programs are overtly racist, including the use of IQ tests that have long been deemed as culturally biased (Blanchett et al., 2009; Frederick & Shifrer, 2018). Statistics continue to show that Black students are overrepresented in special education, accounting for less than 15% of total K-12 enrollment but 17% of SWDs (U.S. Department of Education, 2020). Black students are also more likely to be identified with specific learning disabilities, intellectual disability, and emotional disturbance (Barrio & Allen, 2024; Shell, 2020; Tefera & Fischman, 2020). Labels such as these can make students feel responsible for their academic difficulties, ignore the need for systemic change, create a deficit-focus view of students, and dismiss educational inequities (Garwood & Carrero, 2023). Also, due to these special education identifications, Black students are overwhelmingly placed in self-contained classrooms, contributing to continued school segregation from their non-Black and non-special education peers (Garwood & Carrero, 2023; Mayes & Moore, 2016).

Many Hispanic/Latinx students encounter both overrepresentation and underrepresentation in special education (Cruz & Firestone, 2022; Vega et al., 2016). Hispanic/Latinx students are more likely to be identified as needing special education services for specific learning disabilities (Cruz & Firestone, 2022; U.S. Department of Education, 2020). Researchers suggest the misidentification of Hispanic/Latinx students in special education is more likely to occur in predominantly White school districts due to educators' lack of cultural understanding of the needs of students who are English Language Learners (ELLs) or culturally diverse (Fletcher & Navarrete, 2011; Ford, 2012; Guiberson, 2009; Vega et al., 2016).

Racial inequities in special education identification pathologize not just a student's skin color, but also their bodies and brains. Repeated exposure to educational discrimination and teacher bias (Brown & Chu, 2012; Hope et al., 2014), as well as limited access to resources and opportunities can make students of color with disabilities have lower self-esteem and lower postsecondary aspirations for themselves (Holcomb-McCoy, 2022; Mayes & Moore, 2016). As a result, SWDs graduate at lower rates than their non-disabled peers (NCES, 2019), however, Black SWDs are 1.5 times more likely to drop out of school than White SWDs (Shifter, 2020). Black SWDs are also less likely to graduate with a regular high school diploma and more likely to earn a certificate of completion (Blanchett et al., 2009).

School Counselors and Intersectionality: Serving Students of Color with Disabilities

All counselors, including school counselors, are called to utilize a lens of intersectionality, which we see through the Multicultural Social Justice Counseling Competencies (MSJCC; Ratts & Greenleaf, 2018; Ratts et al., 2016). As a necessary *skill* within the MSJCC, school counselors should possess "culturally responsive critical thinking skills to gain insight into how stereotypes, discrimination, power, privilege, and oppression influence privileged and marginalized clients[students]" (pg. 8). Using these competencies, school counselors advocate for and provide counseling services to support students with intersecting identities, acknowledging that students may be marginalized by some identities while simultaneously being privileged by others (Ratts & Greenleaf, 2018). School counselors can use these competencies to critically assess school policies that reinforce stereotypes and oppressive practices and then advocate for the creation of new

policies. Furthermore, school counselors serve all students through a culturally affirming comprehensive school counseling program (CSCP), aiming to create a welcoming school environment and decrease systemic barriers (ASCA, 2022a). Grounded in their ethical standards (ASCA, 2022a), school counselors demonstrate the belief that all students can be successful, promote cultural competence toward a safer, more inclusive school, and understand how prejudice, privilege, and various forms of oppression affect students (ASCA, 2022a). This necessary work is supported by ASCA position statements. Mainly, according to ASCA (2021), school counselors engage in antiracism by interrogating and dismantling racist practices and policies harmful to Black and Brown students. ASCA (2022b) also outlines the role of school counselors supporting SWDs, including an overview of related laws (e.g., IDEA). Thus, through ethical code and position statements, ASCA reinforces school counselors' pivotal role in supporting students who have identities that have been historically marginalized based on race/ethnicity and disability status. At the same, absent from these documents is the focus on intersectional identities, such as the compounding, interactive impact of race/ethnicity and disability. In addition, these statements also lack practical recommendations. How can school counselors best serve and support students of color with disabilities? This is an important question to ask ourselves, as approximately 14% of the students enrolled in public schools in the U.S. identify as having a disability, and just over half of those SWDs are Black and Brown students (NCES, 2019).

While the concept of intersectionality is addressed limitedly in ASCA ethics and position statements, we have seen some burgeoning coverage in the school counseling literature. For instance, Chan and Colleagues (2021) recommended using a school-based Intersectionality-Based Policy Analysis to conceptualize serving male students of color, centering school policies to combat oppression. Additionally, Ieva and colleagues (2022) studied social justice group counseling training for pre-service school counselors, emphasizing intersectionality. Other scholars examined LGBTQ+ students of color, related to their intersectional identities and experiences with school counselors (Yoon et al., 2024). Wright and Chan (2022) discussed school counselors applying intersectionality theory when facilitating career interventions for students with historically marginalized identities, and most recently, Albright and colleagues (2026) discussed ways to broach the topic of race in disability in school counseling.

Next, regarding disabilities, scholars have primarily focused on preparation and school counselors' roles when working with SWDs (see Alvarez et al., 2020; Goodman-Scott et al., 2019; Milsom & Akos, 2003). Absent from this literature is intersectionality around examining students of color who also have disabilities. Most closely related, Shillingford and colleagues (2021) reviewed school counselors' roles utilizing the ASCA National Model and Multi-tiered Systems of Supports (MTSS) to serve Black Males diagnosed with Dyslexia. While this publication is a helpful start, authors did not address the importance of school counselors utilizing the intersectionality lens, specifically when serving this population. Further, Ratts and Greenleaf (2018) noted the importance of school counselors utilizing the MSJCC framework to not only understand intersectionality but also intentionally incorporate it within professional practice. While the MSJCC is seminal in guiding counselors to utilize intersectionality, social justice, and culturally affirming practices, client identities are discussed broadly and primarily within the lens of the counseling relationship, rather than content specific to students of color with disabilities and the recommendations are also general across all counseling specialty areas, rather than school counseling specifically. In sum, there remains a gap in the school counseling literature focusing specifically on the intersection of identities related to students of color who also have a disability,

and the need for practical suggestions for school counselors to utilize when serving this critical student group.

Case Illustration

In this section, we demonstrate how to apply the ADDRESSING framework into practice with three unique, fictional case illustrations. These case illustrations highlight the intersections of student race and disability while also sharing advocacy strategies to promote student equity, create a positive school climate, and work to eliminate racist and ableist policies and practices in schools. Guided by the ADDRESSING framework (Hays, 2022), with the theory of intersectionality as the foundation, and in expanding the MSJCC (Ratts et al., 2016), we aim for our case illustrations to illuminate the importance of understanding the intersection of identities and the dynamics of power, privilege, and oppression that influence the counseling relationship (Crenshaw, 1989), specifically within the context of school counseling and serving students of color with disabilities. Although the case illustrations presented in this paper were specifically crafted for this paper, they are informed by our previous experiences as school counselors, including real-world challenges and situations encountered in school settings. Thereby, we aim to provide realistic and relevant content to enhance the practical applicability of the ADDRESSING framework to the school counseling profession.

Case Illustration #1: Elementary School Counselor

Mrs. Green is a Black, middle-aged, cisgender, queer woman who is an elementary school counselor in a predominantly White suburban school setting where 5% of her student population is Hispanic/Latinx and 15% of students have a disability. Since kindergarten, Mrs. Green has been working closely with Blake, who is an undocumented 3rd-grade student with a specific learning disability. Blake currently receives ELL services and interventions for reading and math. Blake has been struggling academically. Mrs. Green has established a great working relationship with Blake's parents. Recently, she has been struggling to communicate since the school board updated its spending policies, which led to the district cutting interpreter positions and creating a language barrier for many students and families, including Blake.

Blake "crumbles" each school day right before English Language Arts (ELA), where peers bully her for her inability to "keep up," repeatedly calling her a "dummy" and stupid. Mrs. Green has utilized the Check-In/Check-Out (CICO) system, which is a research-based intervention that can be adapted to support students and provide timely feedback (Bundock et al., 2020; Goodman-Scott et al., 2025). Additionally, this system has allowed Mrs. Green to collect data on Blake's progress throughout the years, which notes a 50% decrease in meltdowns before ELA over the academic years. By addressing Blake's academic, social, and emotional needs using CICO, Blake has grown tremendously in the last academic year. However, Blake's grades have been declining as the bullying incidents have increased.

Connection to the School Counselor and the ADDRESSING Framework

Mrs. Green uses the ADDRESSING framework to note that she holds majority membership as a middle-aged, upper-middle-class, U.S.-born, Christian, able-bodied person. She holds some minority membership within the ADDRESSING framework as a Black woman and lesbian.

Through reflective work, Mrs. Green realizes that while she is a parent of a SWD, she does not have first-hand experience as a person with a disability or experience as an undocumented student. She learns that Hispanic/Latinx students can either be overrepresented or underrepresented in special education (Vega et al., 2016). Additionally, through her research related to The Individuals with Disabilities Act (IDEA, 2004), Individualized Education Plans (IEP), and related to service minutes, Mrs. Green discovers that the services she has been providing to Blake through CICO and small groups can legally be written into her IEP. Mrs. Green worked with the special education director and IEP team to advocate for school counseling services within Blake's IEP by highlighting information included in IDEA around social-emotional support; the team agreed to include these supports.

Additionally, to address the barriers related to communication, Mrs. Green discovers that under IDEA Sec. 300.322, her school and district must ensure, at a bare minimum, that an interpreter be available for Blake's parents as it relates to IEP meetings. However, the district's spending policy led to cut interpreters completely, including for IEP meetings. Mrs. Green advocates at the district level, noting the legal rights of her students and families, such as Blake, to have access to interpreters for these meetings. Through her advocacy efforts, Mrs. Green achieved significant success and is currently collaborating with the district to revise the recently approved spending policy by the school board. She is also developing an advocacy plan to reinstate interpreter services for all forms of communication and is working to incorporate multilingual materials within her culturally affirming CSCP, all while adhering to the spending policy. This facilitated awareness related to knowledge gaps, prompting Mrs. Green to address the legal responsibilities of the district to reinstate interpreter services for Blake as well as other students impacted.

Connection to the Student and the ADDRESSING Framework

As noted earlier, Blake was being bullied by her peers for her academic performance. Since SWDs can be continuously bullied at a higher rate than their peers, it is important for key stakeholders to address social and communication differences (Rose & Gage, 2017). To address bullying, Mrs. Green initiated five different small groups of three SWDs and three peer models to provide psychoeducation on how to identify bullying and report and communicate situations of bullying. The 30 students served in these groups scored an average of 60% on the pre-test, which was focused on defining bullying and reporting incidents correctly, with the average increasing to 88% on the post-test. Through serving Blake in this group, Mrs. Green helped her learn to identify incidents of bullying, how to communicate, and seek support from adults when she is being mistreated. Since the completion of the group, Blake has reported four incidents of bullying with three of the four being appropriate reports where Blake was called stupid and then pushed by a peer and one incident where a peer said she did not like Blake's shoes.

Through CICO, Mrs. Green was able to provide ongoing positive reinforcement when Blake correctly reported mistreatment and feedback on how to handle comments that are unkind but not considered bullying. Another critical step that school counselors can take in addressing school culture is to create a positive environment for SWDs (Milsom, 2006) and continue to work toward cultural competence within the school to create inclusive spaces. Mrs. Green worked with her students of color with disabilities to understand their unique lived experiences and ways to foster a safe school culture, which resulted in the creation of Mindful-Mondays focused on positive peer interactions and providing psychoeducation around peer-to-peer engagement and problem-

solving skills to all students. As a result of Mindful-Mondays, Mrs. Green reported a 25% decrease in referrals to the counseling department for peer conflicts and 20% increase in WOW awards (tickets used to reinforce positive student behavior as part of the school's Positive Behavioral Interventions and Supports (PBIS) tier 1 initiatives).

Case Illustration #2: Middle-School Application

Ms. Miller is a young, White, cisgender woman who is in her third year of being a middle-school school counselor. She works in a school and district where 20% of the student population are students of color. In addition, roughly 12% of the students at the school are individuals with disabilities. Ms. Miller has been working closely with Colin, a Black student with dyslexia who recently moved to the school during the beginning of her 8th-grade year. They quickly establish rapport and Colin discloses that she does not feel supported by her teachers. Colin is a high-achieving student who works hard in all her classes and currently has all As and Bs. However, Colin often experiences strong emotions and is easily overwhelmed as she holds herself to high standards, which has led her to miss school. Her learning disability impacts the amount of effort required to do well in her classes, adding to her overwhelmed feelings.

Ms. Miller has witnessed discrimination by school staff towards Colin in the form of off-handed comments about her inability to “keep it together” by stating that she is “over-emotional” and should be “with those students.” Colin has received harsher punishments than other students for missing class as well as being denied opportunities to make up classwork, resulting in lower grades. This treatment has caused Colin to break down emotionally, making it challenging for her to manage her anger and frustration, often leading to emotional outbursts. Since the school has a zero-tolerance policy, Colin has faced disciplinary action and been suspended. Thus, the IEP team decided to meet to discuss a change of placement for Colin. This would mean removing Colin from being educated with her non-disabled peers (inclusion model) by placing her in a resource room (self-contained classroom).

Connection to the School Counselor and the ADDRESSING Framework

After witnessing discrimination against Colin and expecting the upcoming IEP meeting, Ms. Miller decides to collect additional data on the number of students of color with disabilities. She compares their IEPs to those of their White peers and reviews their goals, accommodations, Least Restrictive Environment (LRE) placements, and disciplinary records. After analyzing the data, she learned that over 50% of students of color with disabilities at her school are placed in resource rooms compared to the 15% of White SWDs. Through meeting with students of color with disabilities at her school, she learned that many have faced similar experiences as Colin. Through her own research, she learns that these inequalities are not isolated to her school and students. She discovers that the district and school policies are rooted in harmful practices, creating inequities for students of color with disabilities. Ms. Miller determined that the information needed to be shared with her principal and advocated for her attendance at Colin's IEP meeting.

In preparation for the IEP meeting, Ms. Miller uses the ADDRESSING framework to consider the cultural complexities of her own identities and those of her students. She recognizes that as a White, cisgender, able-bodied person, she holds power and privilege within the school and may not be able to relate directly to the experiences of her historically marginalized students. However, through this interpersonal work of utilizing the ADDRESSING framework she learns

how to use her position of power to advocate for change as a school counselor. For example, she initiates the development of a culturally affirming CSCP, involving a student focus group as part of the process to ensure student voices are included. This resulted in the first CSCP at the middle-school, rooted in culturally affirming practices and based on student experiences. Secondly, she works to create a check-in process with each student of color with disabilities at her school throughout the academic year. Then, she arranges a meeting with her principal and district special education director to review LRE placements, school policies, and advocate for an internal audit of all placements. Then, to create a more inclusive school, Ms. Miller develops an inclusive model proposal rooted in prompting culture-affirming practices to address current systemic issues impacting her students to present to the school board. Through this work, her goal is to reshape the school's culture, utilizing the theory of intersectionality to dismantle practices and policies where students such as Colin are discriminated against based on their intersectional identities.

Connection to the Student and the ADDRESSING Framework

Through her understanding of the ADDRESSING framework, Ms. Miller uses this knowledge as a foundation in collaboration with Colin's parents so she can gain more insight and understanding of Colin's lived experiences prior to the IEP meeting. She discovered that Colin had experienced some racial discrimination at her previous school and often felt isolated. During the IEP meeting, Ms. Miller recognized the critical role she plays in advocating for Colin's educational rights and confronting the discrimination Colin continues to face.

Additionally, at the meeting, she presented literature related to best practices on how to support Black students with dyslexia and advocated for additional accommodations. After the meeting, Ms. Miller teaches Colin self-advocacy skills and strategies to support her when overwhelming feelings arise when experiencing discrimination or mistreatment. Thus demonstrating how Ms. Miller used the ADDRESSING framework to foster awareness, increase her understanding, utilize her skills, and initiate change.

Ms. Miller collected survey data from students of color with disabilities who engaged in the check-in process during the academic year. Of the 25 students, 20 completed the survey with 90% reporting a shift in the school culture, additional support from teachers, and additional accommodations to actively engage in courses with their peers. Additionally, the internal audit on school policies and LRE with her principal and district special education director confirmed Ms. Miller's findings that students of color with disabilities are placed in resource rooms at a higher rate than their White peers with disabilities. The leadership team worked with Ms. Miller to create professional development training for staff as well as an internal process check-list to utilize during the IEP process. As a result, students' rights to a Free Appropriate Public Education (FAPE) were addressed through Ms. Miller's leadership and advocacy efforts.

Moreover, Ms. Miller advocated forming a team of key stakeholders to examine all district policies that perpetuate systemic and oppressive practices. This team identified 15 specific policies that need revision to promote more inclusive and equitable educational environments. Then the policies were released for public comment and later presented to the school board for approval. This demonstrates how school counselors can use their advocacy skills to drive policy reform.

Case Illustration #3: High School Application

Mr. Bolden is a Black, cisgender man who has worked at a suburban school called London High

as a 9th-12th grade school counselor for three years. Jamie is a 9th-grade Black SWDs at London High. Mr. Bolden learns that due to some personal and academic challenges, there is a chance that Jamie might be retained for his freshman year as he is in danger of not getting enough credits to be promoted. He currently has a 2.5 GPA due to failing a few classes. Jamie has a dual diagnosis of attention deficit hyperactivity disorder (ADHD) and dysgraphia and has had an IEP since middle school. Jamie does not have strong peer connections but is interested in participating in baseball next year.

Mr. Bolden, a former high school athlete, is empathetic to Jamie's situation and understands how getting involved in activities after school could be beneficial to his social and emotional development while recognizing the district's GPA policy could hinder Jamie's involvement in sports. In individual meetings with Mr. Bolden, Jamie expresses the embarrassment he feels surrounding his disabilities, especially when his teachers make announcements to the entire class about pulling him for services. He also gets frustrated because, despite his IEP, his teachers do not seem to understand his disabilities. Jamie shares he is often bored and cannot focus in class, which has led to several failing grades and disruptive behavior. The teachers seem to connect his classroom disruptions with his ADHD diagnosis, but Jamie still has received office disciplinary action for not being able to manage his emotions because of the school's zero-tolerance policy.

Connection to the School Counselor and the ADDRESSING Framework

Mr. Bolden shares several intersecting identities with Jamie within the ADDRESSING framework and connects to Jamie regarding his racial and gender identity, but he does not have a disability. Using the ADDRESSING framework, a lens of intersectionality, and through collaboration with Jamie, Mr. Bolden is able to gain an understanding of Jamie's unique educational experiences. Through his own research, Mr. Bolden learns that students of color with disabilities are 1.5 times more likely to drop out of school (Schifter, 2020), coupled with his own lived experiences of being a Black student in the educational system and the impacts that it had on him as a young Black man. He acknowledges that, as a school counselor, he needs to utilize his leadership and advocacy skills to create systemic change within London High. He recognizes the impact and barriers the school district's zero-tolerance discipline policy has had on students of color with disabilities, like Jamie. Utilizing a culturally affirming CSCP, Mr. Bolden partners with the administration to launch professional development trainings that address systemic issues and works to create welcoming spaces to support students of color with disabilities. As a result of this training, in the third grading period, discipline office referrals for students of color with disabilities were down 10% and referrals increased by 20% to the counseling department for SEL support. Further, Mr. Bolden advocates for changes in the district's zero-tolerance policy by presenting to the school board, utilizing data to dismantle a barrier preventing growth and success for students such as Jamie. His advocacy efforts compelled the school board to create a special task force of key stakeholders (students, teachers, administrators, parents, school counselors, and the community) to review the zero-tolerance policy and make recommendations for a new policy the following academic year.

Connection to the Student and the ADDRESSING Framework

Mr. Bolden has worked to establish rapport with Jamie and can utilize his knowledge of the ADDRESSING framework to provide psychoeducation around intersections of identity to Jamie. However, Mr. Bolden recognizes that participation in sports will continue to help foster

community and connection for Jamie at school. Yet, the current GPA policy is blocking Jamie's participation in sports. After doing a quick search, Mr. Bolden stumbles across a letter outlining Section 504 and the connection to activities for SWDs as well as legal rights (U.S. Department of Education, Office for Civil Rights, 2013). Utilizing this information, Mr. Bolden advocates for Jamie in collaboration with the special education coordinator to remove this systemic barrier, allowing Jamie the opportunity to engage in baseball. Mr. Bolden also recognizes that it will be important for Jamie to learn how to advocate for his rights and accommodations. In partnership with Jamie's family, Mr. Bolden works to educate Jamie on his ADHD diagnosis, current services, and accommodations within his IEP. Then, he helps Jamie learn how to advocate, engage in his own IEP meetings, and learn effective communication strategies to work with his teachers.

Implications

Relatedly, at this time, the ADDRESSING framework has been used predominantly in clinical counseling psychology practice, and this paper offers a new use of the framework. This article also underscored the importance of understanding and practicing the MSJCC framework (Ratts et al., 2016), providing a novel perspective not otherwise seen in the literature, with implications for both practice and systemic change (i.e., policy, leadership, and advocacy). To do this, we utilized the ADDRESSING framework (Hays, 2022) to provide concrete practice examples for school counselors to utilize intersectionality in serving students of color with disabilities. As a result, school counselors can utilize not only the conceptual content in this article but also the practical implications through the case illustrations. Practicing and pre-service school counselors can apply this combination of content and examples to their practice in the schools, enabling them to work through each of the steps in the ADDRESSING framework, in their unique setting.

Incorporating the ADDRESSING Framework

Each case illustration provides a unique example of how school counselors can incorporate the ADDRESSING framework into their work by examining their own intersecting identities and membership within groups that have been historically privileged or marginalized and how these experiences might influence choices, biases, and advocacy efforts when serving students of color with disabilities. Additionally, to create a culturally affirming environment supporting inclusion and removing systemic barriers, the school counselors in the case illustrations explored the intersecting identities of their students related to how race-based and disability-based educational experiences, rooted in teacher bias, racism, ableism, and discriminatory school policies, impact their students' academic success. As such, all three school counselors took the time to become aware of their own cultural identities, understand the multiple identities of their students, and recognize how the school setting may have acted as a system of power that oppressed their students. Through reflection and self-awareness, these school counselors acted as leaders and change agents in their schools. Closely related to an intersectionality lens, these self-reflective practices align with Mayes and Byrd's (2022) antiracist framework, such as actively engaging in ongoing self-reflection and implementing culturally responsive and antiracist school counseling approaches and CSCPs.

Advocacy for Policy Change

School counseling is grounded in systemic change, social justice, and advocacy (ASCA, 2025), and these efforts require effort across many levels or systems, therefore we offer multi-systemic levels of implications, shaping policy at various levels. To start, as a result of our article, we ask: how can intersectionality (i.e., through the application of the ADDRESSING framework) be more purposefully integrated into key school counseling approaches and documents? Examples include the ASCA National Model (2025), ASCA position statements, and best practices in school counseling (i.e., school counselor interventions; data collection and analysis, etc.). Next, as school counseling exists within the context of K-12 education, how can other educational frameworks also more purposefully center intersectionality, such as Multi-tiered Systems of Supports, Social Emotional Learning, culturally sustaining practices, trauma-informed practices, and so on. In tandem, school counseling and educational leaders/organizations can also elevate the conversation on intersectionality, such as embedding related concepts and practical examples in organizational mission and vision statements, as well as practical work (i.e., member services, training, research, and lobbying). Counseling and education are also influenced by regional, state, and federal policy, laws, and funding. As a result, how can school counseling professionals and organizational lobbyists identify and partner with willing legislators and other key influential decision-makers, to embed the concepts of intersectionality throughout said policy and laws, and thereby influencing funding?

Through these case illustrations, we highlight several aspects of school culture and policy that can be oppressive to students of color with disabilities with recommendations for advocacy (see Table 1 for summary of advocacy and policy recommendations). Research supports that students of color with disabilities receive higher frequency and harsher disciplinary measures compared to their other peers (Losen & Gillespie, 2012). Thus, we address this policy issue by suggesting school counselors get involved in policy change that provides more emotional support and environmental/academic accommodation to SWDs instead of harsher punishments such as school suspension or refusal to allow making up missing work for missed class time (as seen in Colin and Jamie's illustrations). Supports can include the check-in check-out intervention, small and larger group psychoeducation for students about topics such as bullying and problem solving, and student focus groups to learn more about SWDs experiences and needs. We also recommend looking at zero-tolerance policies and include multiple stakeholder voices to make changes that will not negatively impact SWDs. GPA policies for participating in after school activities, such as sports, can impact SWDs chances at participating with peers in activities that can enrich both their school and social lives (as seen in Jamie's illustration). Thus, we suggest advocacy to make exceptions around this rule, taking a students' disability into consideration.

Additionally, research suggests that students of color are more likely to be placed in higher restrictive environments compared to their White peers (see Morgan, 2020). As such, we suggest that school counselor's facilitate internal audits to review Least Restrictive Environment (LRE) for students of color with disabilities, to determine if their students are appropriately placed (as seen in Colin's illustration). This could also lead to policy change about how determination for LRE is made within the district, with special attention to students of color with disabilities. We encourage the use of literature, data, and professional development opportunities to educate school administrators and staff on systemic issues and discrepancies in student treatment, as well as best practices regarding specific disabilities such as dyslexia and ADHD. We also highlight possible issues with interpreter services for families with language barriers and encourage school counselors to be advocates for students who both need and deserve this service (as seen in Blake's illustration). Blake's illustration also highlights the need for changes in school bullying policies,

Table 1
Advocacy and Policy Change

Common Issue	Case Illustration	Suggested Advocacy/Policy Change
Harsher disciplinary measures	Colin & Jamie	Compare disciplinary measures amongst students to highlight any discrepancies Advocacy for policy change to include increased social/emotional support and environmental/education accommodation for SWDs, which could be written in the IEP to reduce relying on disciplinary measures Professional development for administrators and staff to address systemic issues
More restrictive learning environment	Colin	Internal audit of all SWDs and their placements for re-evaluation to determine if they are placed in the least restrictive environment
Lack of appropriate services (barriers to access to educational services, barriers to language interpreter services, barriers to access to after-school activities, etc.)	Blake & Jamie	Advocacy for school policy change that meets IDEA rights to access appropriate services and needs Advocacy to take students' disabilities into consideration for exceptions to GPA rules for access to after-school activities
Increased risk of bullying	Blake	Multi-tiered school counselor support from individual to classroom to whole school intervention focused on reducing bullying and providing emotional support to those experiencing bullying, as well as teaching problem-solving
Feeling misunderstood by school staff	Colin & Jamie	Professional development for school staff to address discrimination and best practices for working with students with specific disabilities, such as dyslexia and ADHD Student focus groups to give SWDs a voice in sharing their experiences and needs

given the increased risk of experiencing bullying that SWDs face (Rose & Gage, 2017). This could include a multi-tiered approach to education and support within schools regarding bullying and impact. Finally, school counselors can advocate for their own social/emotional support services to be included on students' IEPs (as seen in Blake's illustration) to provide additional mental health support to students of color with disabilities.

School Counselor Education

We believe in the power of education for improving knowledge, understanding, and

Alvarez et al. (2026)

implementation of useful skills and strategies. As such, we recommend education about models and topics related to this area in both pre-service (during masters level courses) and in-service learning. Notable models and topics to include in educational plans could include teaching, discussion, self-reflection, and practical use of the ADDRESSING framework (Hays, 2022) and the MSJCC (Ratts et al., 2016). Additionally, discussion and reflection about the intersection of race and disability, school policies that impact these students, and advocacy skills to address related issues would be valuable for school counselors. School counselors' self-awareness of their own biases and assumptions is an ongoing effort that should start in pre-service training as this may impact how they view and work with students in future. The new 2024 standards of education developed by the Council for Accreditation of Counseling and Related Educational Programs (CACREP, 2024), an educational governing system, does include education around advocacy for individuals with disability (section A.4). However, the majority of educational requirements around disability services is noted under the Rehabilitation Counseling section, which is separate from both clinical and school counseling education. The standards do include a section on social and cultural identities and experiences (section B.1-11) that incorporate education about cultural difference, social justice, multigenerational trauma, and more, which are in line with issues noted in this paper. Including more discussion about this topic with the intersection of disability would help prepare school counselors to implement models, such as the ADDRESSING framework (Hays, 2022), that could benefit their students.

Conclusion

This article aimed to identify the role school counselors can hold when serving students who have intersecting identities of a historically marginalized race/ethnicity and being a student with disability. We recommend Hay's (2022) ADDRESSING framework as a model to assist school counselors in reflecting on their own personal identities as well as the identities and needs of their SWDs. Hay's framework highlights the complexity of identity, including **Age/Generation**, **Disability** (developmental), **Disability** (acquired), **Religion/Spirituality**, **Ethnicity**, **Socioeconomic Status**, **Sexual Orientation**, **Indigenous Heritage**, **National Origin**, and **Gender**. We used three case illustrations to highlight common issues that students of color with disabilities may face in their school systems at the elementary, middle, and high school level. By applying the ADDRESSING framework to their culturally affirming CSCP, school counselors can provide academic, career, and social/emotional services that specifically support students of color with disabilities.

Although this conceptual article offers case illustration examples of how school counselors can apply the ADDRESSING framework into their work to directly support students of color with disabilities, the intersecting identities as a student of color and a person with a disability call for continued research, advocacy, and policy changes. Further research to see the impact of use of the ADDRESSING framework by school counselors would be a benefit in order to assess outcomes on school counselor confidence and student success. Additionally, studying policy changes made by school districts would be useful to see what impacts are seen by their students of color with disabilities. In conclusion, we know that school counselors play a critical role in ensuring culturally affirming practices within their schools and this can be achieved partly by implementing the ADDRESSING framework in their work, acting as antiracist and anti-ableist counselors, and purposefully advocating for historically marginalized students of color with disabilities.

ORCID ID

Jenna M. Alvarez  <https://orcid.org/0000-0001-7743-9028>

Vanessa Sinclair  <https://orcid.org/0000-0002-9155-6252>

Stephanie Smith-Durkin  <https://orcid.org/0000-0003-0474-9839>

Emily Goodman-Scott  <https://orcid.org/0000-0003-4129-3308>

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References

- Albright, A., Goodman-Scott, E., Alvarez, J., & Boulden, R. (2026). Broaching race and disability in school counseling. *Journal of Multicultural Counseling and Development*, 54, 105-111. <https://doi.org/10.1002/jmcd.70020>
- Alvarez, J., Bhat, C. S., & Landmark, L. J. (2020). Are school counselors sufficiently prepared to serve students with disabilities? *Journal of School Counseling*, 18(19), 1-25. <https://www.jsc.montana.edu/articles/v18n19.pdf>
- American School Counselor Association (2025). *ASCA national model: A framework for school counseling programs* (5th ed.). American School Counselor Association.
- American School Counselor Association. (2019b). *ASCA school counselor professional standards and competencies*. <https://www.schoolcounselor.org/getmedia/a8d59c2c-51de-4ec3-a565-a3235f3b93c3/SC-Competencies.pdf>
- American School Counselor Association. (2021). *The school counselor and anti-racist practices*. <https://www.schoolcounselor.org/Standards-Positions/Position-Statements/ASCA-Position-Statements/The-School-Counselor-and-Anti-Racist-Practices>
- American School Counselor Association. (2022a). *ASCA ethical standards for school counselors*. <https://www.schoolcounselor.org/getmedia/44f30280-ffe8-4b41-9ad8-f15909c3d164/EthicalStandards.pdf>
- American School Counselor Association. (2022b). *The school counselor and students with disabilities*. <https://www.schoolcounselor.org/Standards-Positions/Position-Statements/ASCA-Position-Statements/The-School-Counselor-and-Students-with-Disabilities>
- Barrio, B., & Allen, C. D. (2024). Addressing disproportionality and racial inequities in special education through policy change. *Theory into Practice*, 63(2), 377-389. <https://doi.org/10.1080/00405841.2024.2355819>
- Blanchett, W. J., Klingner, J. K., & Harry, B. (2009). The intersection of race, culture, language, and disability. *Urban Education*, 44(4), 389-409. <https://doi.org/10.1177/0042085909338686>
- Brennan, M. (2018). *Understanding body size through Hays' ADDRESSING framework: Integrating fatness as a new identity dimension* (Publication No. 10825316) [Doctoral

- dissertation, Widener University]. ProQuest Dissertations Publishing.
- Brown, C. S., & Chu, H. (2012). Discrimination, ethnic identity, and academic outcomes of Mexican immigrant children: The importance of school context. *Child Development*, 83(5), 1477–1485. <https://doi.org/10.1111/j.1467-8624.2012.01786.x>
- Bundock, K., Hawken, L. S., Kladis, K., & Breen, K. (2020). Innovating the check-in, check-out intervention: A process for creating adaptations. *Intervention in School and Clinic*, 55(3), 169–177. <https://doi.org/10.1177/1053451219842206>
- Chan, C. D., Ngadjui, O. T., Jackson, T., & Steen, S. (2021). Unsettling complex inequities on school climate for males of color: School counseling applications from an intersectionality-based policy analysis. *Professional School Counseling*, 25(1c), 1–14. <https://doi.org/10.1177/2156759X211040029>
- Chin, G., Anyanso, V., & Greeson, J. (2019). Addressing diversity in mindfulness research on health: A narrative review using the ADDRESSING framework. *Cooper Rowan Medical Journal*, 1(1), 2. <https://pmc.ncbi.nlm.nih.gov/articles/PMC6746558/pdf/nihms-1047837.pdf>
- Cho, S., Crenshaw, K. W., & McCall, L. (2013). Toward a field of intersectionality studies: Theory, application, and praxis. *Journal of Women in Culture and Society*, 38(4), 785–801. <https://doi.org/10.1086/669608>
- Council for Accreditation of Counseling and Related Educational Programs. (2024). *2024 CACREP standards*. <https://www.cacrep.org/wp-content/uploads/2024/04/2024-Standards-Combined-Version-4.11.2024.pdf>
- Crenshaw, K. (1989). Demarginalizing the intersection of race and sex: A Black feminist critique of antidiscrimination doctrine, feminist theory, and antiracist politics. *University of Chicago Legal Form*, 8, 139–167. <https://chicagounbound.uchicago.edu/uclf/vol1989/iss1/8>
- Cruz, R. A., & Firestone, A.R. (2022). Understanding the empty backpack: The role of timing in disproportionate special education identification. *Sociology of Race and Ethnicity*, 8(1), 95–113. <https://doi-org.proxy.lib.odu.edu/10.1177/23326492211034890>
- Fletcher, T. V., & Navarrete, L. A. (2011). Learning disabilities or difference: A critical look at issues associated with the misidentification and placement of Hispanic students in special education programs. *Rural Special Education Quarterly*, 30(1), 30–38. <https://doi.org/10.1177/1538192711401917>
- Ford, D. Y. (2012). Culturally different students in special education: Looking backward to move forward. *Exceptional Children*, 78, 391–405. <https://doi.org/10.1177/001440291207800401>
- Frederick, A., & Shifrer, D. (2018). Race and disability: From analogy to intersectionality. *Sociology of Race and Ethnicity*, 5(2), 200–214. <https://doi.org/10.1177/2332649218783480>
- Garwood, J. D. & Carrero, K.M. (2023). Lifting the voices of Black students labeled with emotional disturbance: Calling all special education researchers. *Behavioral Disorders*, 48(2), 121–133. <https://doi.org/10.1177/01987429221130729>
- Goodman-Scott, E., Alvarez, J., Boulden, R., Daines, E., Perez, B., & Shirley, S. (2025). Neurodiversity and neuro-affirming school counseling: Practical strategies across the three tiers. *Professional School Counseling*, 29(1). <https://doi.org/10.1177/2156759X251375333>
- Goodman-Scott, E., Bobzien, J., & Milson, A. (2019). Preparing preservice school counselors to

- serve students with disabilities: A case study. *Professional School Counseling*, 22(1), 1-11. <https://doi.org/10.1177/2156759X19867338>
- Guiberson, M. (2009). Hispanic representation in special education: Patterns and implications. *Preventing School Failure*, 53, 167–176. <https://doi.org/10.3200/psfl.53.3.167-176>
- Hays, P. A. (2022). *Addressing cultural complexities in counseling and clinical practice: An intersectional approach* (4th ed.). American Psychological Association.
- Hays, P. A. (2024). Four steps toward intersectionality in psychotherapy using the ADDRESSING framework. *Professional Psychology: Research and Practice*, 55(5), 454-462. <https://doi.org/10.1037/pro0000577>
- Hines, D.E., Boveda, M., & Lindo, E.J. (2021). *Racism by another name: Black students, overrepresentation, and the carceral state of special education*. Information Age.
- Holcomb-McCoy, C. (2022). *School counseling to close the opportunity gaps: A social justice framework for success* (2nd ed.). Corwin.
- Hope, E. C., Skoog, A. B., & Jagers, R. J. (2014). It'll never be the White kids, it'll always be us: Black high school students' evolving critical analysis of racial discrimination and inequity in schools. *Journal of Adolescent Research*, 30, 83-112. <https://doi.org/10.1177/0743558414550688>
- Ieva, K. P., Steen, S., & Beasley, J. J. (2022). Preparing school counselors for social justice group counseling: Examining, power, privilege, and intersectionality. *Counselor Education and Supervision*, 61, 362–378. <https://doi.org/10.1002/ceas.12250>
- Individuals with Disabilities Education Act, 20 U.S.C. § 1400 (2004).
- Lake, A. J., Rodriguez-Quintana, N., Lewis, C. C., & Brothers, B. M. (2022). Addressing diversity: Clinical assessment and outcomes in a psychology training clinic. *Training and Education in Professional Psychology*, 16(3), 229-234. <https://doi.org/10.1037/tep0000346>
- Losen, D. J., & Gillespie, J. (2012). *Opportunities suspended: The disparate impact of disciplinary exclusion from school*. The Center for Civil Rights Remedies. <https://civilrightsproject.ucla.edu>
- Love, B. L. (2019). *We want to do more than survive: Abolitionist teaching and the pursuit of educational freedom*. Beacon Press.
- Mayes, R. D., & Byrd, J. A. (2022). An antiracist framework for evidence-informed school counseling practice. *Professional School Counseling*, 26(1a), 1–10. <https://doi.org/10.1177/2156759X221086740>
- Mayes, R. D., & Moore, J. L. (2016). The intersection of race, disability, and giftedness. *Gifted Child Today*, 39(2), 98–104. <https://doi.org/10.1177/1076217516628570>
- Milsom, A., & Akos, P. (2003). Preparing school counselors to work with students with disabilities. *Counselor Education and Supervision*, 43, 86-95. <https://doi.org/10.1002/j.1556-6978.2003.tb01833.x>
- Milsom, A. (2006). Creating positive school experiences for students with disabilities. *Professional School Counseling*, 10(1), 66-72. <https://doi.org/10.1177/2156759X0601001S09>
- Morgan, H. (2020). Misunderstood and mistreated: Students of color in special education. *Voices of Reform: Educational Research to Inform and Reform*, 3(2), 72-81. <https://doi.org/10.32623.3.10005>
- Murad-Martinez, S. (2022). *Building multicultural humility: The role of clinician's intersectionality of identities and privilege awareness in the therapeutic alliance &*

- clinical practice* (Publication No. 29397381) [Doctoral dissertation, Adler University]. ProQuest Dissertations Publishing.
- National Center for Education Statistics (2019). *Digest of education statistics*. https://nces.ed.gov/programs/digest/d19/tables/dt19_204.40.asp?current.asp
- National Center for Education Statistics. (2023). *Racial/ethnic enrollment in public schools*. <https://nces.ed.gov/programs/coe/indicator/cge>
- Ratts, M. J., & Greenleaf, A. T. (2018). Multicultural and social justice counseling competencies: A leadership framework for professional school counselors. *Professional School Counseling, 21*(1b), 1–9. <https://doi.org/10.1177/2156759X18773582>
- Ratts, M. J., Singh, A. A., Nassar-McMillan, S., Butler, S. K., & McCullough, J. R. (2016). Multicultural and social justice counseling competencies: Guidelines for the counseling profession. *Journal of Multicultural Counseling and Development, 44*(1), 28–48. <https://doi.org/10.1002/jmcd.12035>
- Rose, C. A., & Gage, N. A. (2017). Exploring the involvement of bullying among students with disabilities over time. *Exceptional Children, 83*(3), 298–314. <https://doi.org/10.1177/0014402916667587>
- Schifter, L. (2020). The ADA has fallen short for Black students. It's past time to fix that. *Education Week*. <https://www.edweek.org/teaching-learning/opinion-the-ada-has-fallen-short-for-black-students-its-past-time-to-fix-that/2020/07>
- Shell, E.M. (2020). Exploring school counselors' preparation to address disproportionality of African American students in special education. *Teaching and Supervision in Counseling, 2*(1), 84–94. <https://doi.org/10.7290/tsc020108>
- Shillingford, M. A., Butler, S. K., Mitchell, M. D., & Heard, N. J. (2021). Experiences of Black males with dyslexia in the U.S. education system. *Professional School Counseling, 25*(1c), 1–8. <https://doi.org/10.1177/2156759X211040041>
- Tefera, A.A. & Fischman, G.E. (2020). How and why context matters in the study of racial disproportionality in special education: Toward a critical disability education policy approach. *Equity & Excellence in Education, 53*(4), 434–449. <https://doi.org/10.1080.10665684.2020.1791284>
- U.S. Department of Education, Office of Civil Rights. (2013, January 25). *Letter from the acting assistant secretary for civil rights*. <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201301-504.pdf>
- U.S. Department of Education. (2020). *OSEP fast facts: Black or African American children with disabilities*. <https://sites.ed.gov/idea/osep-fast-facts-black-or-african-american-children-with-disabilities-20/>
- Vega, D., Hines, E. M., Mayes, R. D., & Harris, P. C. (2016). Preparing Latino students for life after high school: The important role of school counselors and school psychologists. *National Youth Advocacy and Resilience Journal, 2*(1), 70–82. <https://doi.org/10.20429/nyarj.2016.020107>
- Wright, G. G., & Chan, C. D. (2022). Applications of intersectionality theory to enhance career development interventions in response to COVID-19. *Professional School Counseling, 26*(1b), 1–10. <https://doi.org/10.1177/2156759X221106807>
- Yoon, E., Sherman, L., & Jean-Baptiste, K. E. (2024). K–12 experiences of LGBTQ+ students of color: Findings from the first focus group interview. *Professional School Counseling, 28*(1b), 1–11. <https://doi.org/10.1177/2156759X241247160>

School Counselors' Roles, Beliefs and Practices Related to Section 504: Results of a National Survey

Robert J. Gilbert

Loyola University Maryland

Maiko Xiong

California State University, Sacramento

Erin P. Kilpatrick

University of Georgia

Tiffany Wilson

Florida State University

School counselors are responsible for providing services to all students, including those eligible under Section 504 of the Rehabilitation Act, through a comprehensive school counseling model. This study using survey methodology examines the roles, practices and beliefs of school counselors in relation to Section 504, focusing on differences based on Title I status and geographic setting. A national survey of school counselors ($N = 609$) revealed that 90% serve as case managers for Section 504 plans, with only 17.9% working solely in a consultation and collaboration role in eligibility determinations. Additionally, 31% reported involvement in Section 504 disputes (due process, Office of Civil Rights (OCR) investigations, district grievances). The majority of counselors (73.1%) agreed that managing 504 plans creates a dual role, while 59.8% reported that this responsibility limits their ability to implement a comprehensive counseling program. Inferential analysis showed significant differences in beliefs about equitable access to 504 eligibility, with counselors in Title I schools more likely to report equitable access. Implications of practice and future research directions are discussed within.

Keywords: school counselor, Section 504, role, scope of practice, equitable beliefs

School counselors (SCs) play an essential role in supporting the educational and developmental needs of all students, including those with disabilities (American School Counselor Association [ASCA], 2022a). SCs design and implement comprehensive school counseling programs (CSCPs) that address the holistic needs of every student (ASCA, 2023a). Within these programs, SCs serve as advocates for equity, ensuring that students with disabilities receive appropriate services and accommodations. Federal laws such as the Section 504 of the Rehabilitation Act of 1973, mandate that students with disabilities receive accommodations to access education equitably (Rehabilitation Act, 1973). However, unlike the Individuals with Disabilities Education Improvement Act (IDEA, 2004), which is federally funded and supports structured special education services, Section 504 is an unfunded civil rights statute implemented within general education settings. This distinction creates variability in how accommodations are managed within

schools, often placing SCs in roles that may conflict with their professional training and ASCA's position on working with students with disabilities. Given these challenges, this study utilizes a national survey to examine school counselors' roles, beliefs, and practices related to Section 504. By providing new quantitative insights, this study aims to identify systemic challenges and opportunities for reform, particularly in relation to school economic status (Title I vs. non-Title I schools).

Section 504 and SCs

Students with disabilities receive services under two legislative statutes: the Individuals with Disabilities and Education Improvement Act (IDEA, 2004), a federally funded statute, and the Section 504 of the Rehabilitation Act of 1973, a civil rights statute. According to the most recent data released by the U.S. Department of Education Office for Civil Rights (2024), of the 49.2 million students enrolled in public schools, 8.4 million students (17 %) were identified as having a disability. Of these students identified with a disability, 6.8 million (14%) qualified for services under IDEA and 1.6 million (3%) were served solely under Section 504. IDEA (2004) requires students to meet eligibility under one of 13 disability categories to receive special education services. As a result, these narrowed categories often overlooked students with disabilities who did not meet IDEA criteria but still required protections for equitable access (Zirkel & McGuire, 2010; Zirkel, 2023). In contrast, Section 504 provides a broader framework. Section 504 mandates that schools identify and evaluate students whose disabilities substantially limit one or more major life activities (Zirkel, 2023). Although Section 504 is intended to protect all eligible students, its broad eligibility criteria and non-funded nature disproportionately benefit families with greater social capital, leaving underrepresented students at a disadvantage (Lewis & Muñiz, 2023).

Prior to the passage of the Americans with Disabilities Act Amendments Act (ADAAA, 2008), Section 504 was also more narrowly defined in terms of limitations to major life activities (Zirkel & McGuire, 2010; Zirkel, 2023). The passage of the ADAAA expanded eligibility for disability protections. For example, it recognized thinking and concentrating as impairments which can limit a major life activity, and it introduced a non-exhaustive list of disabilities to ensure broader eligibility (Zirkel, 2023). The Office for Civil Rights (OCR) issued guidance to further define and interpret these changes, ensuring their consistent implementation in educational settings (U.S. Department of Education, OCR, 2016). According to OCR guidance, the eligibility process involves (1) identifying students who may have a disability, (2) conducting an evaluation that is not limited to academic performance alone, (3) making an eligibility determination based on whether the impairment substantially limits a major life activity, and (4) ensuring access to accommodations and services without considering mitigating measures such as medication (OCR, 2016). The ADAAA (2008) expanded the scope of Section 504, emphasizing a broader and more inclusive approach than IDEA. This expansion ensures that students who may not qualify for special education services under IDEA still receive the necessary support to equitably access their education (Zirkel & Weathers, 2016). While the passage of the ADAAA expanded access to Section 504 services, disparities exist in who benefits from these protections (Lewis & Muñiz, 2023; Zirkel & Gullo, 2024; Zirkel & Weathers, 2016). Although White students make up 46% of the total K-12 population, they account for 60% of Section 504 recipients (OCR, 2024). In contrast, Black and Hispanic students, who make up 15% and 28% of the population are underrepresented at 12% and 21% respectively (OCR, 2024). Similarly, English Learners account for 11% of student enrollment but only 5% of those served under Section 504 (OCR, 2024).

Furthermore, due to the non-funded nature of Section 504, implementation occurs in general education settings without support from special education programs (Zirkel, 2016). This lack of funding has created a gap in the personnel responsible for managing services, often resulting in SCs taking on the coordination and oversight of accommodations (Goodman-Scott & Boulden, 2019; Madaus & Shaw, 2008). According to the position statement *The School Counselor and Section 504 Plan and Process* (ASCA, 2024), ASCA states that SCs role within the 504 process is to serve as part of the school's multidisciplinary team, acting on behalf of students through advocacy, collaboration, and consultation. It further clarifies inappropriate roles and scope of practice. For example, SCs should not make singular decisions related to 504 plans, serve in any supervisory capacity, or write Section 504 plans (ASCA, 2024).

Despite ASCA's clear guidance that SCs should not act as case managers or assume administrative duties for Section 504 plans, studies suggest that SCs frequently fill these roles due to gaps in assigned personnel inconsistencies (Goodman-Scott & Boulden, 2019; Madaus & Shaw, 2008). This misalignment with professional expectations presents multiple challenges for SCs, particularly as the number of students qualifying for Section 504 accommodations continues to rise. SCs often feel inadequately prepared to support students on Section 504 plans, citing limited training both during their graduate programs and on the job (Goodman-Scott et al., 2018; Kolodinsky et al., 2009; Romano et al., 2009). Goodman-Scott and Boulden's (2019) qualitative research further highlights key challenges including the time-intensive nature of case management, strained relationships due to dual-role conflicts, and insufficient training for navigating legal and procedural complexities. Additionally, the lack of standardization in Section 504 procedures contributes to confusion and inequity in service delivery, disproportionately affecting historically marginalized students (Lewis & Muñiz, 2023). In their analysis, Lewis and Muñiz (2023) found that Section 504 plans are disproportionately concentrated in wealthier, often suburban school districts, and underrepresented in high-poverty (Title I) schools, particularly those in urban and rural areas. This suggests that implementation of 504 policies may vary significantly by district context, making geographic location and socioeconomic status important variables to explore. While Lewis & Muñiz (2023) identified patterns of disproportionality, their work did not explore the intersection of school counselors, including the impact of roles, practices and beliefs in relation to their findings. The ASCA code of ethics provides guidance that SCs should be advocates for students found in systems of inequalities, and this is further solidified in the ASCA position statement that provides guidance of SCs as advocates for students with disabilities (ASCA, 2022a; ASCA, 2022b). Building on these findings, it is essential to examine SCs roles, beliefs, and practices in relation to Section 504 inequities and implementation. Research has underscored the importance of aligning SCs' responsibilities with their professional training to ensure equitable service delivery (Goodman-Scott, 2015; Watkinson et al., 2018). However, the existing literature on SCs' work with students with disabilities is sparse, particularly regarding Section 504. A content analysis of the first ten years of *Professional School Counseling* found that less than 10% of published manuscripts focused on students with disabilities (Falco et al., 2011). A more recent follow-up study by the same lead author categorized disability-related research within a broader multicultural issues category, which also encompassed topics such as LGBTQ+ students, racial and cultural identity, students in complex circumstances (e.g., homelessness, incarcerated parents, undocumented status), and social justice themes. Collectively, these topics accounted for 13% of published manuscripts (Falco et al., 2025). While this categorization reflects the growing emphasis on diverse student needs, it also suggests that scholarship specifically addressing students with disabilities and school counselors may receive less focused attention, highlighting a gap in the

literature. A broader review of the literature at the time of this study revealed a significant gap in research examining school counselors' roles, beliefs, and responsibilities in supporting students under Section 504, with no quantitative studies conducted since the implementation of the ADA of 2008. Additionally, no studies were found exploring school counselors' beliefs about equity in Section 504 implementation. Prior to conducting this study, a comprehensive review of counselor education journals identified only one publication in the past decade that examined school counselors' and Section 504 (e.g., Goodman-Scott & Boulden, 2019). By the study's completion, a second article by the same authors had been published (e.g., Boulden & Goodman-Scott, 2024). To develop a more comprehensive understanding of Section 504, particularly in the context of the ADA, it was necessary to expand the literature review beyond counseling journals and incorporate older research. This broader approach contextualizes the increase in incidence of Section 504 eligibility, a critical factor that has not been adequately addressed in recent studies on school counselors and Section 504.

The Current Study

Following the conceptualization and launch of this project, Boulden and Goodman-Scott (2024) published the School Counselor Roles and Activities Instrument, a tool designed to categorize SC engagement in Section 504-related activities. Our study compliments this foundation by employing a national survey to examine the frequency, perceptions, and systemic factors influencing school counselors' roles, beliefs, practices and advocacy in the 504 process. This distinction is critical, as our findings contribute empirical data to the broader discussion on school counselors' responsibilities, policy compliance, and equity in Section 504 implementation. Given the limited empirical research on this topic, our study provides much-needed quantitative insights into SCs' engagement with Section 504. The authors conducted a national survey to examine SCs' experiences with Section 504 from a quantitative perspective. Specifically, the study aims to (a) explore the frequency and incidence of SCs' roles and scope of practice in working with students on 504 plans, (b) investigate their beliefs regarding Section 504 training, implementation, and equity, (c) assess their compliance with current Section 504 laws, and (d) identify differences in roles, beliefs based on geographic location, and economic status of schools as determined by Title I classification. The current study builds on prior qualitative findings and offers new quantitative insights into the systemic challenges and opportunities for reform. By assessing the intersection of training, equity, and practice, this study contributes to a deeper understanding of how SCs can better serve students with disabilities while adhering to their professional standards. The research questions for this study were as follows:

1. To what extent do school counselors engage in specific roles and practices related to Section 504 plans, and how frequently do they perform these responsibilities?
2. To what extent do school counselors endorse beliefs related to Section 504 training, implementation fidelity, and access?
3. To what extent do school counselors comply with current Section 504 requirements in their daily practice?
4. Do school counselors' roles and beliefs of Section 504 differ significantly based on geographic location (rural, urban, suburban) and school socioeconomic status (Title I vs. non-Title I)?

Method

Our survey design was based on the methods used in previous national surveys by Swank and colleagues (2019), who studied school counselors' perceptions of their roles in bullying prevention, and by Joe et al. (2023), who examined school counselors' beliefs, attitudes, and professional behaviors related to sexual health and HIV prevention. Similarly, Brown and Armstrong (2022) conducted a survey exploring school counselors' use of ethical decision-making models, underscoring the importance of structured frameworks in guiding professional responsibilities. Building on these frameworks, we adapted a similar methodology to investigate school counselors' roles, beliefs, and practices within Section 504.

Procedure

We recruited a nationwide sample of SCs to ensure diverse representation across geographic locations, school economic statuses (Title I vs. non-Title I), and school types (urban, suburban, rural). We administered the survey in early Fall 2024 and kept it open for 25 days to increase the caliber of rigor (Griffith & Villares, 2023). We used a non-probability convenience sampling method, combined with snowball sampling, to enhance response rates. After obtaining Institutional Review Board (IRB) approval, we distributed the study announcement via social media platforms, various state counseling associations, and professional contacts across several states. The announcement included a URL and QR code directing participants to the online Qualtrics survey. Before starting the survey, participants were required to provide informed consent and confirm that they were licensed or credentialed, practicing SCs. We redirected those who did not consent or meet the criteria to the end of the survey. Participants were given the option to enter a drawing to win one of two \$100 Visa gift cards as an incentive.

Participants

The study initially included 855 participants. We applied listwise deletion to remove cases with incomplete or missing data, resulting in a final sample of 609 participants. To ensure the study had sufficient power to detect meaningful effects, we conducted a power analysis using G*Power software (Creswell & Guetterman, 2025). For the ANOVA, the analysis was based on a priori criteria, with an alpha level of 0.05, a power of 0.95, and a medium effect size (Cohen's $f = 0.25$). GPower indicated that a minimum of 252 participants were needed for the ANOVA. With a final sample of 609 participants, the study exceeded the required sample size, ensuring sufficient power to detect significant differences in SCs' roles and beliefs regarding Section 504 for the analysis.

The majority of participants identified as female ($n = 570$, 93.6%), followed by male ($n = 35$, 5.7%), non-binary/third gender ($n = 2$, .2%), and two participants (0.3%) who preferred not to disclose their gender. Participants represented various school settings, including suburban schools ($n = 271$, 44.5%), rural schools ($n = 188$, 30.9%), and urban schools ($n = 132$, 21.7%). Eighteen participants (2.9%) selected two geographic settings. While their responses were retained for analyses related to Research Questions 1 through 3, they were excluded from the geographic region analyses in Research Question 4 to ensure mutually exclusive group comparisons. Regarding the socioeconomic status of the schools, we asked participants to indicate whether their school district was classified as Title 1, with those responding yes ($n = 360$, 59.1%), those responding no ($n = 223$, 36.6) and those not sure ($n=26$, 4.3%). Almost the entire sample worked in public schools ($n = 590$, 93.6%), with participants in charter schools (n

= 21, 3.4%) and private schools ($n = 15$, 2.5%). In terms of experience working as a SC, participants reported 8 years or more ($n = 338$, 55.5%), 3–4 years ($n = 106$, 17.4%), 5–7 years ($n = 93$, 15.3%), and 1–2 years ($n = 72$, 11.8%). A majority of participants reported graduating from a program accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP) ($n = 498$, 81.8%). Of those who completed a course focused on special education as part of their graduate studies, participants reported yes ($n = 291$, 47.7%), no ($n = 284$, 46.6%), and unsure ($n = 34$, 5.5%). Additionally, participants reported engaging in professional development or post-graduate training related to Section 504 content or students with disabilities ($n = 386$, 63.4%) or not ($n = 223$, 36.5%). Regarding counselor-to-student caseload, participants reported a caseload consistent with the ASCA recommended ratio of 1:250 ($n = 211$, 34.6%), while many more surpassed this, 1:500 ($n = 337$, 55.3%), 1:750 ($n = 43$, 7.1%), and exceeding 750 students (17, 2.8%). Participants reported having 20 or more 504 plans within their caseloads ($n = 260$, 42.7%), 16–20 plans ($n = 119$, 19.5%), 11–15 plans ($n = 106$, 17.4%), 6–10 plans ($n = 72$, 11.8%), 1–5 plans ($n = 49$, 8%), and no plans ($n = 3$, .5%).

Survey Instrumentation

At the time of this study, a thorough review of school counseling journals revealed a lack of recent psychometrically validated instruments assessing school counselors' roles, competencies, and scope of practice related to Section 504. The most relevant research, conducted over 15 years ago, focused on survey instrument development before the ADA (Romano et al., 2009). Given the recent publication of the ASCA position statement on Section 504 and the four themes identified by Goodman-Scott and Boulden (2019), the first author recognized the need for a new survey instrument to examine the frequency and incidence of school counselors' roles, responsibilities, and beliefs regarding Section 504 of the Rehabilitation Act of 1973. As a result, the first author developed and piloted a new survey instrument for this study. It is important to note that Boulden and Goodman-Scott's (2024) instrument was published after the conclusion of our study. We believe our survey developed in this study complements the work of Boulden and Goodman-Scott (2024).

Utilizing survey development procedures outlined by Creswell and Guetterman (2024) and an extensive literature review, we developed stem questions to align with the four themes and ten sub themes identified in Goodman-Scott and Boulden's (2019) qualitative research and informed by Role Theory (Kahn et al., 1964). Additionally, the questions were informed by the ASCA position statement on school counselors and Section 504, as well as research by Lewis and Muñiz (2023) on inequitable access and the misuse of Section 504. Further, literature on Section 504 compliance, policy interpretations, and prior surveys contributed to the instrument's development (Holler & Zirkel, 2008; Madaus & Shaw, 2008; Romano et al., 2009; Zirkel, 2011; Zirkel, 2023). Following the literature review, the first author generated 41 initial questions based on the qualitative themes from Goodman-Scott and Boulden (2019). Each question was then systematically coded according to one of the four themes or ten subthemes to ensure alignment with the literature. For example, the item "I believe my role in relation to Section 504 creates a dual role" was coded under the theme of *Relational Strain with Teachers, Students, and Families*, as identified by Goodman-Scott and Boulden (2019).

Validity

To establish content validity, we followed a process consistent with Poynton's (2023) recommended steps for construct validity. The first author sought feedback from a designated panel of school counselor educators and practitioners affiliated with the School Counseling Interest Network Disabilities Group. Two panel members, both holding doctoral degrees, had extensive experience as currently practicing or former school counselors working with Section 504 and had taught counselor education courses specifically focused on disabilities. This expert panel reviewed and provided targeted feedback on question construction, content validity, and usability, leading to key revisions in the survey. Based on their recommendations, several questions, particularly those related to school counselors' beliefs about equity and advocacy, were refined, while items concerning diagnosis were removed to maintain alignment with school counseling roles. The recommendations of the panel resulted in a survey of 32 questions not including demographics. Following these revisions, the updated survey was sent to a practicing school counselor with extensive Section 504 experience who was completing her doctoral program. Her feedback on clarity and structure further informed final refinements to wording and question organization, resulting in the finalized survey instrument.

The revised survey was divided into four sections. The first section includes 14 questions related to participants' demographic information and areas of practice. The second section contains 18 questions about the roles of SCs in working with Section 504. To gather behavioral data regarding SC roles, frequency responses were used, anchored with the terms "Never," "Sometimes," "Often," and "Always." This scale enables the measurement of response frequency, facilitating the analysis of trends in SCs' roles concerning Section 504. The third section focuses on processes and compliance that SCs report in their work with Section 504, and includes 6 questions that measure the frequency with which SCs follow specific procedures related to Section 504. This section uses ordinal frequency responses to capture the extent of SCs' engagement in Section 504 compliance. The final section assesses SCs' beliefs regarding Section 504, and includes 8 questions that utilize a 5-point Likert scale ranging from "strongly disagree" to "strongly agree."

Reliability of Survey

Although this survey follows a methodology similar to prior research (e.g., Joe et al., 2023; Swank et al., 2019), which did not conduct reliability studies, we elected to assess internal consistency to demonstrate methodological rigor. Given that the survey measures discrete behaviors and task frequencies over three broad areas, rather than a single underlying construct, Cronbach's Alpha may not be the most appropriate metric as a singular reliability measure. Instead of calculating reliability for the entire survey, we conducted Cronbach's Alpha separately for each of the three sections. This approach ensures methodological rigor while acknowledging that variations in responses likely reflect professional role differences rather than measurement error. Internal consistency for Section II: Roles was assessed using Cronbach's alpha, yielding a reliability coefficient of $\alpha = .627$ (standardized $\alpha = .653$). For Section III: Compliance, Cronbach's alpha indicated $\alpha = .701$ (standardized $\alpha = .729$), suggesting acceptable reliability. Section IV: SC Beliefs yielded $\alpha = .473$ (standardized $\alpha = .460$), indicating lower internal consistency. While reliability varies across sections, a factor analysis could potentially realign item groupings. However, such an analysis extends beyond the scope of this study and will be addressed in the limitations and future research sections.

Data Analysis

Data analysis was conducted using IBM SPSS Statistics. We addressed the first three research questions using descriptive statistics to examine the roles and responsibilities of SCs in relation to Section 504, their beliefs about training, equity, and implementation, and the extent to which SCs comply with current Section 504 law and guidance in their daily practice. For the fourth research question, we explored differences in SCs' roles and beliefs related to Section 504 by analyzing responses to specific questions. Regarding roles, participants were asked whether they currently served as Section 504 case managers responsible for updating plans, distributing them to teachers and families, and communicating updates and changes. Responses to this item were categorical (Yes/No). Participants were also asked how frequently they participated on Section 504 eligibility determination teams in a consultative or collaborative role, rather than as managers or coordinators. This item was measured on a 5-point frequency scale: "Never," "Once in a while," "Fairly often," "Frequently," and "Always or almost always." For beliefs, participants indicated their level of agreement with two statements: (1) "My school implements 504 eligibility in a fair and equitable way," and (2) "Students without strong parent or guardian advocates have the same access to Section 504 eligibility as those with strong advocates." These items were measured using a 5-point Likert scale (1 = Strongly Disagree to 5 = Strongly Agree). Differences in participants' roles and beliefs were analyzed based on (a) the geographic location of the school (urban, suburban, rural), and (b) the economic status of the school population, using Title I designation as a proxy for socioeconomic status.

A chi-square was utilized to examine differences in roles and one-way ANOVAs were used to examine differences in beliefs for the analysis of research question four. According to Warner (2013), one-way ANOVAs require several assumptions to be met. In this study, assumptions for each one-way ANOVA were assessed through visual inspection of histograms, the Kolmogorov-Smirnov and Shapiro-Wilk tests of normality, and Levene's test for homogeneity of variance. Histogram review indicated that the distributions of belief scores were approximately normal across groups, with no substantial skewness, kurtosis, or outliers observed. Although the Kolmogorov-Smirnov and Shapiro-Wilk tests indicated statistically significant deviations from normality, research suggests that such violations have minimal impact on statistical analyses when sample sizes are large (Barri, 2019). With a sample of 609 participants, the study had sufficient statistical power to conduct robust inferential analyses. To further strengthen the validity of the findings, a bootstrapped one-way ANOVA with 1,000 resamples was conducted using the bias-corrected and accelerated (BCa) method. Results from the bootstrapped analysis were consistent with the standard ANOVA, reinforcing confidence in the conclusions despite minor deviations from normality. Additionally, Levene's test for homogeneity of variance was conducted, and results for significant findings are reported below.

Results

Research Question 1

The authors employed descriptive quantitative analysis to address the first research question: To what extent do school counselors engage in specific roles and practices related to Section 504 plans, and how frequently do they perform these responsibilities?

The complete results are presented in Tables 1 and 2. Key findings from these tables are highlighted below. The majority of respondents (90%) reported currently serving as Section 504 case managers, while 10% indicated they do not. The survey also examined SCs' roles in Section 504 eligibility determination, specifically in consultation and collaboration rather than in managerial or coordinative roles. Only 17.9% of respondents indicated they "always" serve in this capacity, whereas nearly half (47.8%) reported they "never" do so. (SCs) were asked about their roles in advocating for the implementation of Section 504 plans as written, as well as their involvement in ensuring enforcement of those plans. Regarding the implementation of 504 accommodations, 53% of counselors reported "always" advocating for accommodations to be

Table 1
Roles and Scope of Practice with Students and 504s

Scope of Practice	Always	Frequently	Fairly Often	Once in a While	Never
Write 504 accommodation plans	58.8	10.5	9.9	9.9	13.5
Advocate for students' 504 eligibility	37.4	25.5	19.7	15.9	0.8
Plan, coordinate and implement 504 eligibility meetings	61.4	8.4	5.4	8.5	15.9
Provide counseling services as part of a 504 plan	7.4	8.2	10.2	31.5	42.4
Participate in Manifestation Determination processes	23.0	6.9	5.4	30.9	23.2
Serve in consultation roles on 504 eligibility teams	17.9	12.2	8.0	14.0	47.8
Serve in consultation roles on 504 eligibility teams	17.9	12.2	8.0	14.0	47.8
Provide Tier II/III counseling services outside 504 plans	19.5	20.5	21.0	23.2	15.6
Advocate for accommodation fidelity in 504 plans	53.0	24.0	13.8	7.1	1.8
Enforce accommodation fidelity in 504 plans	41.0	18.1	13.1	11.8	15.1
Collaborate with teachers on interventions	40.1	23.8	18.4	14.6	3.0
Complete annual counselor/administrator meetings	22.0	8.2	5.6	16.1	48.1
Suggest 504 plans to parents	3.4	8.4	18.7	57.6	11.7

Note. This table presents school counselors' roles and scope of practice with Section 504 plans, shown as percentages of responses. All values are rounded to one decimal place; totals may not sum exactly due to rounding.

implemented as written. y contrast 41% reported "always" enforcing these accommodations. However, 15.1% indicated they "never" enforce them. In terms of involvement in disputes related to 504 plans, 19.2% of respondents had been involved in a dispute once, and 11.8% had been involved more than once. The majority of respondents (69%) reported never having been involved in any disputes.

Table 2
Case Manager of 504s as Reported in Scope and Practice

Role	Frequency	Percent
School Psychologist	18	3.0
Special Education Teacher	14	2.3
Administrator	74	12.2
School Counselor	436	71.6
Social Worker	4	0.7
Instructional Coach	4	0.7
Special Education Coordinator	27	4.4
Teacher	6	1.0
Other	26	4.3

Note. This table presents school counselors' roles and scope of practice with Section 504 plans, shown as percentages of responses. All values are rounded to one decimal place; totals may not sum exactly due to rounding.

Research Question 2

The authors used descriptive quantitative analysis to explore the second research question: To what extent do school counselors endorse beliefs related to Section 504 training, implementation fidelity, and access? The full results are found in Table 3. We will highlight key findings that will also be addressed in the discussion section. A slight majority of respondents felt adequately knowledgeable and trained for their role, with 23.8% "strongly agreeing" and 26.8% "agreeing" with the statement. However, 18.2% "disagreed" and 11.7% "strongly disagreed," indicating a notable proportion of counselors who feel unprepared. Additionally, 17.6% were "neutral" on the matter, and 2% were "not sure." A majority of respondents felt that their master's program did not adequately prepare them for working with 504 plans. Only 2.5% "strongly agreed" and 5.9% "agreed" that they received adequate training, while 30.4% "disagreed" and 51.4% "strongly disagreed" and 9.9% were "neutral." When asked if they had the necessary legal and ethical training for their role, only 16.9% "strongly agreed" and 26.3% "agreed." In contrast, 22.5% "disagreed" and 15.9% "strongly disagreed," suggesting that a significant number of counselors feel underprepared in this area. Another 17.7% were "neutral," and 0.7% were "not sure."

Questions related to beliefs around implementation highlighted that the majority of respondents felt that their role in relation to 504 plans creates a dual role, with 41.4% "strongly agreeing" and 31.7% "agreeing." However, 12.6% were "neutral" on this issue, and 13% either "disagreed" or "strongly disagreed" and 1.6 reported being "unsure." SCs reported that their role in managing 504 plans often inhibits their ability to implement a CSCP. Of the respondents, 34.2% "strongly agreed" and 25.6% "agreed" with this statement. A smaller proportion 15.4% "disagreed"

and 6.1% "strongly disagreed," while 17.1% remained "neutral" and 1.5% "were unsure."

Questions related to advocacy and access to Section 504 eligibility and implementation found that respondents expressed concern that students without strong parent advocates do not have the same access to 504 eligibility. Only 15.8% "strongly agreed" and 23.6% "agreed" that access is equal, while 31.2% "disagreed" and 16.6% "strongly disagreed." Another 11.5% were "neutral," and 1.3% were "not sure." Regarding the fairness and equity of 504 eligibility implementation, 28.2% of counselors "strongly agreed" and 39.9% "agreed" that their school implements 504 eligibility in an equitable manner. Fewer respondents expressed concerns, with 8.2% "disagreeing" and 4.4% "strongly disagreeing," while 18.4% remained "neutral."

Table 3
School Counselors' Beliefs Regarding Section 504

Belief	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not Sure
Adequate knowledge and training for role	23.8	26.8	17.6	18.2	11.7	2.0
School implements 504 eligibility fairly	28.2	39.9	18.4	8.2	4.4	0.8
Role creates a dual role	41.4	31.7	12.6	9.9	3.1	1.6
Role inhibits implementation of a comprehensive program	34.2	25.6	17.1	15.4	6.1	1.5
Legal and ethical training necessary for role	16.9	26.3	17.7	22.5	15.9	.7
Received adequate 504 training in master's program	2.5	5.9	9.0	30.4	51.4	0.0
Medical plans and 504s are different	26.3	43.5	15.4	8.7	2.3	3.6
Students without strong parent advocates have equal access	15.8	23.6	11.5	31.2	16.6	1.3

Note. Percentages reflect school counselors' responses regarding beliefs about Section 504 roles and responsibilities. All values are rounded to one decimal place; totals may not sum exactly due to rounding.

Research Question 3

The authors used descriptive quantitative analysis to explore the third research question: To what extent do SCs comply with current Section 504 requirements in their daily practice? The full results are found in Table 4. We will highlight a few key findings that will also be addressed in the discussion section. A majority of respondents (58%) reported that their schools "always" follow a standardized process for determining 504 eligibility, with an additional 18.6% reporting that this occurs "frequently." However, 5.1% indicated that their schools follow this process "once in a while," and 4.1% reported that they "never" adhere to a standardized process. Nearly half of the respondents (47.8%) stated that their schools "always" use multiple data sources when considering Section 504 eligibility, and 23.3% said this occurs "frequently." Still, a small proportion of schools rarely use multiple data sources, with 10% reporting that they do so "once in a while," and 3.8% "never" using multiple data sources for eligibility decisions. Training on Section 504 laws appears to be inconsistent across schools and districts. Only 19.7% of respondents reported that their schools "always" provide training related to 504 mandates, eligibility, compliance, and procedures. The majority of respondents (35.1%) reported that training is provided "once in a while," and

24.3% said that training is "never" offered in their schools.

Table 4
504 Compliance Practices in Schools

Scope of Practice	Always	Frequently	Fairly Often	Once in a While	Never
Standardized process for 504	58	26.8	17.6	18.2	11.7
Use of multiple data sources	28.2	39.9	18.4	8.2	4.4
Policy timeline for 504 reviews	41.4	31.7	12.6	9.9	3.1
Standardized 504 plan form for accommodations	34.2	25.6	17.1	15.4	6.1
Training on 504 mandates, compliance, and implementation	16.9	26.3	17.7	22.5	15.9
Standardized procedural safeguard notice	2.5	5.9	9.9	30.4	51.4

Note. This table shows percentages of school responses regarding 504 compliance practices. All values are rounded to one decimal place; totals may not sum exactly due to rounding.

Research Question 4

The authors conducted inferential analyses to address the fourth research question: Are there differences in roles, and beliefs based on the geographic location and economic status of schools, as determined by Title I classification? Significant results are summarized in Table 5. A Chi-Square Test of Independence was conducted to examine whether the distribution of school counselors' 504 roles (case manager vs. non-case manager) differed based on school Title I status (Title I vs. non-Title I) and the geographic region of the school (urban, suburban, or rural). Participants that were "Not sure" of their Title I status or that marked two geographic regions were removed from the analysis. No significant differences were found in roles between Title I and non-Title I schools or across geographic regions. Similarly, a one-way ANOVA revealed no significant differences in school counselors' beliefs about the fair and equitable implementation of 504 eligibility across geographic regions.

A one-way ANOVA was conducted to examine differences in SCs' beliefs about the fair and equitable implementation of 504 eligibility based on Title I status (Yes, No). Participants who were "Not sure" were removed from the analysis. Levene's test for homogeneity of variances was statistically significant, $F(1, 581) = 6.70, p = .010$, indicating a violation of the assumption. As recommended by Warner (2013), Welch's ANOVA was conducted to account for unequal variances. The Welch test indicated a statistically significant difference in beliefs based on Title I status, $F(1, 452.46) = 7.53, p = .006$. A standard ANOVA also revealed a significant effect, $F(1, 581) = 7.71, p = .006$ with a small effect size, $\eta^2 = .013$. Although the effect size was small, this finding highlights a meaningful difference in perceptions between counselors working in Title I and non-Title I schools, suggesting that counselors in Title I schools perceive their schools as implementing Section 504 eligibility more equitably.

A one-way ANOVA was conducted to examine the differences in SCs' beliefs about access to Section 504 eligibility for students with strong parent advocates compared to those without, based on their school's Title I status (Yes, No). Levene's test indicated that the assumption of homogeneity of variances was met, $F(1, 581) = 1.61, p = .204$. The analysis revealed a significant effect of Title I status on beliefs about access, $F(1, 581) = 4.490, p = .035$. The effect size, $\eta^2 = .008$, suggests a small effect. Although the effect size was small, this finding suggests that counselors in Title I schools perceive greater equity in access to 504 eligibility for students lacking strong parent advocates compared to their counterparts in non-Title I schools.

Table 5
ANOVA Summary Table

Measure	Title I		Non-Title I		F(1,581)	ƒd
	M	SD	M	SD		
Belief in Fair/equitable 504 implementation	3.92	1.07	3.66	1.13	7.71***a	.013
Belief that students without strong parent advocates have equal access to 504 eligibility	3.06	1.37	2.81	1.45	4.49***	.008

Note. *** $p < .05$; ^a Welch's ANOVA was used due to violation of homogeneity of variances, $F(1, 452.46) = 7.53, p = .006$.

Discussion

Section 504 of the Rehabilitation Act of 1973 was designed to ensure equitable educational access for students with disabilities (Zirkel, 2023). However, the findings of this study highlight critical quantitative gaps in how professional SCs interpret, manage, and experience Section 504 processes, raising concerns about systemic inequities and role conflicts. These findings build on existing literature that critiques inconsistencies in the implementation of Section 504 and the misalignment of SCs' responsibilities with their professional training (Goodman-Scott & Boulden, 2019; Madaus & Shaw, 2007; Romano et al., 2009).

A central challenge revealed by this study is the inappropriate assignment of 504 case management duties to SCs. Despite ASCA's guidance against this practice, 90% of participants reported serving as 504 case managers. These responsibilities often lead to dual-role conflicts, with 41.4% strongly agreeing and 31.7% agreeing that 504 duties interfere with their counseling practice. Furthermore, over half of the participants reported always or frequently enforcing 504 accommodations, a task that may create tension with teachers and undermine collaborative relationships. These dual roles potentially expose SCs to legal risks and raise ethical questions. In our study, 19.2% of the participants reported that they were involved in a civil rights, due process, or grievance dispute related to Section 504 at least once, and 11.8% were involved more than once.

Additionally, this study highlights the significant gaps in the preparation and training of SCs. A substantial proportion (24.3%) of participants reported never receiving 504 training from their schools, and only 19.7% reported consistent training. Compounding this issue, 51.1% strongly disagreed and 30.4% disagreed that their graduate programs adequately prepared them for 504 responsibilities. These findings reflect broader trends in the literature, where SCs

consistently report feeling unprepared to address the needs of students with disabilities (Goodman-Scott et al., 2018; Kolodinsky et al., 2009; Milsom, 2002; Nichter & Edmonson, 2005). Such gaps exacerbate the discrepancy between preparation and practice, limiting counselors' ability to address systemic inequities effectively.

Another significant challenge pertains to equity in Section 504 implementation. Although 68.1% of participants perceived their school's 504 processes as fair, national data indicate that Section 504 disproportionately benefits white, affluent students (Lewis & Muniz, 2023). Zirkel (2023) attributes this to the unfunded nature of Section 504 and its broad eligibility criteria, which favor families with greater social capital. Nearly 47% of counselors reported that students without strong caretaker advocates face reduced access to 504 accommodations, underscoring barriers for marginalized families. Addressing these challenges requires a multifaceted approach. Standardized processes for determining 504 eligibility are crucial (Zirkel, 2023), yet this study found significant variability, with 58% of participants reported always using standardized procedures, and 18.6% reported doing so frequently. Similarly, while 47.8% of participants always used multiple data sources for eligibility decisions, an established policy requirement, 3.8% reported never doing so. Standardization and consistent practices can minimize legal risks and reduce inequities in implementation (Zirkel, 2023).

Furthermore, the findings underscore the need for systemic reform to better align Section 504 practices with equity and professional standards. Statistically significant differences in perceptions of equity based on Title I status suggest that socioeconomic context influences SCs' experiences. SCs in Title I schools reported more favorable perceptions of equitable implementation compared to those in non-Title I schools. This nuance highlights the potential for equitable practices in resource-constrained settings but also points to broader systemic inequities that disadvantage marginalized families. The findings of this study support the insights of Lewis and Muñoz (2023), who highlighted that families from wealthy suburban districts have greater access to resources and privileges that aid in eligibility.

Implications

Findings of this study lend preliminary support for the role of systemic inequities and role misalignment in undermining SCs' ability to deliver equitable, student-centered services within the Section 504 implementation process. This is one of the first nationwide quantitative studies to examine the roles, practices, and beliefs of SCs regarding Section 504, including their training, implementation, compliance with laws, and perceptions of equity, while exploring differences based on geographic location and school economic status. Specifically, the tension between SCs' professional responsibilities and the demands of 504 case management reflects broader systemic inequities and misalignment of roles.

SCs' contributions are most impactful when focused on advocacy, consultation, and collaboration within a CSCP which is essential for fostering equitable student outcomes (Carey et al., 2012; Lapan et al., 2012). Collaboration between SCs and administrators is necessary because administrators play a pivotal role in directing the scope of counselors' responsibilities. Positive relationships with principals significantly enhance counselors' ability to prioritize CSCP-related duties (Lowery et al., 2018). Further, when SCs are tasked with non-counselor duties, such as administrative case management, they face role conflicts and diminished capacity to meet the needs of all students (DeCino et al., 2023; Goodman-Scott & Boulden, 2019). The administrative burden of Section 504 case management, often placed on school counselors, may create ethical challenges

by limiting their ability to provide equitable academic, career, and social/emotional support and conflicting with their responsibility to prioritize direct student services over inappropriate administrative duties (ASCA, 2022b). SCs should advocate for role alignment that prioritizes their professional responsibilities as outlined by ASCA. One approach is to strategically utilize the annual administrative meeting to reinforce their appropriate role and advocate for expanded services for students protected under Section 504 within a Tier two MTSS framework (ASCA, 2019a). These services, tailored to student needs, may include individual counseling, small group interventions, transition planning, and academic support, ensuring meaningful assistance rather than solely managing case documentation and implementation. Furthermore, training gaps exacerbate these challenges. Over 81% of participants in this study indicated inadequate preparation for Section 504 during their master's programs. The lack of adequate training limits counselors' effectiveness and compels them to rely on trial-and-error methods when supporting the Section 504 process. SCs report a "lack of expertise" as a recurring issue in supporting students with disabilities (Goodman-Scott & Boulden, 2019). Previous research points to the inadequacies of counselor education programs in preparing SCs to support students with disabilities (Goodman-Scott et al., 2018; Kolodinsky et al., 2009; Milsom, 2002; Nichter & Edmonson, 2005). The lack of training may result in SCs being assigned inappropriate roles related to Section 504 case management. The Council for Accreditation of Counseling and Related Programs (CACREP) emphasizes training school counselors in a consultative and collaborative role to advocate for equity and access (CACREP, 2024). While CACREP addresses broad ethical and legal considerations, it does not provide specific, detailed guidance on K-12 disability laws such as IDEA and Section 504. It is essential for SCs to have a comprehensive understanding of Section 504, its implications within the school setting, and the appropriate roles they should assume to maximize positive outcomes for students. Counselor education programs can incorporate thorough training on Section 504, emphasizing legal, ethical, and collaborative practices that inform ASCA aligned roles. Additionally, SCs should advocate for participation in specialized training to support students with disabilities, stay informed about current laws impacting these students, and collaborate with staff who possess expertise in working with students with disabilities.

The study also highlights systemic inequities in 504 plan implementation, reflecting broader trends of privilege and access. Systemic factors such as the non-funded nature of Section 504, expanded eligibility criteria under the ADA, and limited district resources exacerbate inequities, with privileged families more effectively navigating the system to secure advantages for their children (Zirkel, 2023). Lovett (2020) highlights the variability in the efficacy and fairness of accommodations, particularly extended time, one of the most requested supports. Addressing these systemic inequities requires a critical examination of policy implementation, resource allocation, and the professional responsibilities assigned to SCs. SCs must act as advocates for systemic equity, addressing disparities in access to accommodations for marginalized populations (Lewis & Muñiz, 2023). Advocacy includes educating parents and communities, particularly those from underrepresented backgrounds, about their rights and the processes for securing 504 accommodations. While these findings have clear implications for counselor training and professional advocacy, they also point to needed changes at the systems and policy levels, particularly in how schools allocate responsibilities, define counselor roles, and structure support for equitable access to accommodations.

Implications for Policy

Building school counselors' social justice advocacy capacity in the varying levels of the school counseling ecosystem holds promise for intentional policy reform and resource allocation to improve students' equitable access to accommodations (Savitz-Romer & Nicola, 2022). School counseling policy, as it relates to equitable access to accommodations, is indirectly and directly influenced by an amalgamation of national, state, school district, and local school policies (Gay, 2021; Niles, 2022). School counseling policy reform ought to help school counselors engage in the business of building and implementing their CSCPs in order to support student achievement and success in the areas of academic planning, social/personal growth, and college/career planning (ASCA, 2019a; Gay, 2021). ASCA (2022b) exhorts school counselors to "affirm the abilities of all students and advocate for their learning needs, supporting the provision of appropriate accommodations and accessibility" (B.2.k.). Relatedly, school counselors ought to "identify and advocate for resources needed to optimize and support academic, career, and social/emotional development opportunities" (A.10.c.) for historically marginalized populations of students who are eligible for services related to a section 504 Plan.

School counselor-driven policy reform that ensures equitable access to accommodations must be grounded in both professional standards and systemic awareness. This includes implementing the ASCA National Model to develop a locally responsive CSCP (ASCA, 2019a), applying the ASCA position statement on supporting students with section 504 plans (ASCA, 2024), and critically understanding how power dynamics and allocation of resources shape opportunities within schools (Young & Lewis, 2015). The school counseling ecosystem framework provides a valuable lens to contextualize and strengthen SCs' role in policy reform, particularly as it relates to equity in resource allocation and service delivery (Savitz-Romer & Nicola, 2022). One potential area for school counselor policy reform in the school counselor ecosystem lies in the microsystem, where SCs can collaborate with local school administration to advocate for more just allocation of resources and implementation (Savitz-Romer & Nicola, 2022), such as the implementation of Section 504 accommodations.

Extant literature (Gay, 2021) illuminates the need for school counselors to continuously assert their professional roles and duties and provide education on appropriate/inappropriate uses of time to their building principal and local school leadership/administration, as outlined by the ASCA National Model (2019a). The aim of school counselor advocacy for appropriate roles is to reduce school counselor to student ratios, provide a culturally sustaining CSCP, and close opportunity and access gaps for students (Grothhaus et al., 2020). Local school leadership oversees hiring decisions which inadvertently impacts school counseling roles/duties positively or negatively as related to supporting student access to accommodations. School counselors seek proximity to influence school leadership decision making through reporting results of the CSCP so as to "advocate for the proper role...to help reduce ratios, or to increase social capital" (Gay, 2021, p. 24). School counselors leverage their capacity to build professional relationships with school leadership to explore shared values for equity and meeting local school improvement goals, since building principals' perceptions and values influence local school interventions and allocation of resources related to students with disabilities' access and accommodations (O'Laughlin & Lindle, 2015; Printy & Williams, 2015). Moreover, such a collaborative dynamic between the school counselor and school leadership is beneficial for the school counselor to advocate to "remove barriers that may impede the effectiveness of the school and/or the school counseling program in promoting equitable student outcomes" (B.2.e) (ASCA, 2022b), such as inappropriate duties and high caseloads (Savitz-Romer & Nicola, 2022).

To improve resource allocation for school counselors to thereby improve students' access

to equitable accommodations requires a school leadership mindshift. An aspirational school leadership mindset toward school counselors privileges the latter's training, perspective, problem-solving skills, proactive stance, advocacy skills, and ability to affect change, particularly for students who deserve access to accommodations (ASCA, 2022a). School leadership demonstrates that they value their counselors' time by removing Section 504 case management from their duties, allowing counselors to focus on ensuring students are eligible for and equitably access accommodations from a CSCP advocacy lens. School leadership demonstrates its commitment to valuing counselors' time by removing Section 504 case management duties, enabling counselors to focus on eligibility and equitable access to accommodations through a CSCP advocacy lens. School leadership selects a trained, competent teacher leader or school administrator to oversee management of section 504 meetings and related communication/duties. School leadership decisions impact the response to intervention (RTI) and multi-tiered systems of support (MTSS) infrastructure at the local school (Printy & Williams, 2015). Therefore, a better use of school counselor time to maximize the goal of 80% of their time involved in direct services and 20% of their time focused on indirect services would be the placement of the school counselor on a RTI/MTSS local school committee as a committee member or consultant (ASCA, 2019a). Furthermore, as an RTI/MTSS committee member, the school counselor regularly analyzes school-wide data, collaborates with teachers and school leadership, and makes recommendations to promote equitable student access to accommodations (ASCA, 2019a). Supplementing beginning of the school year program planning of annual school data summary to include results from a data analysis exploring the reasons, context, and demographics for the initiation of 504 plans (i.e. student support team meeting, student transferred it from a previous school, upcoming Advanced Placement or similar tests) for the past year would provide information to the school counseling department on potential student opportunity gaps in access to accommodations. In effect, the school counseling department could incorporate interventions to close such gaps.

As a school counselor engages in social justice advocacy to improve resource allocation and equitable access to accommodations for students of marginalized backgrounds through collaboration with school leadership, their microsystem will propel student success (Lewis & Muñiz, 2023). Therefore, the school counselor's success with advocacy for equitable accommodations will be the impetus for more explorations to advance change in other areas of the school counseling ecosystem (Savitz-Romer & Nicola, 2022).

Limitations and Future Research

Although this study offers a quantitative survey perspective to complement prior qualitative research, its findings should be interpreted with consideration of its limitations. First, while the survey instrument was developed using a rigorous design process to ensure face validity, and reliability analyses were conducted to enhance methodological rigor, further research could focus on refining its psychometric properties. A follow-up study could include a more in-depth factor analysis to realign questions and further develop the survey into a more targeted and validated instrument with higher internal reliability. The results of this study should consider the moderate level of internal reliability in sections II and IV. Strengthening instrumentation in future research can enhance and extend the current survey and inferential design, allowing for a more comprehensive exploration of school counseling policy and practice implications.

Second, the study's non-experimental design and use of convenience sampling may limit the generalizability of the findings. Future research could address this limitation by employing

randomized sampling methods and intentionally targeting a more diverse population. Additionally, participants in this study may have been drawn to the topic due to personal interest, which, combined with the use of self-reported data, introduces the potential for participant bias. It is also important to delineate the nature of self-reported beliefs. While beliefs can be informed by a variety of factors, including observation, it is important to denote the distinction. In concert with this, the survey design did not investigate specific time allocations dedicated to Section 504 case management or the broader scope of SCs' responsibilities related to Section 504 time allocation. Future studies should examine these factors to gain a deeper understanding of how time allocated to Section 504 responsibilities affects the implementation of CSCP. Moreover, research could explore whether specific school counselor variables predict their ability to manage non-counseling tasks that are misaligned with their training and hinder the implementation of a CSCP. Although this survey employed a broad design, it did not capture all elements of the school environment. Future research could investigate grade-level and building-level differences to better understand SCs' experiences with Section 504.

Third, the significant findings between Title I and non-Title I schools regarding beliefs about equitable implementation of Section 504 should be interpreted with caution due to the small effect size. While the statistical significance indicates a measurable difference in perceptions, the magnitude of this difference is relatively modest. This suggests that while Title I status may be a contributing factor in shaping school counselors' beliefs about equity in Section 504 implementation, it is likely not the sole or primary influence. Though these findings provide context for understanding school counselors' beliefs about equitable access and complement the quantitative outcomes of research by Lewis and Muñiz (2023), the small effect size should be a consideration in the interpretation of these findings. The small effect size may reflect the complexity of factors that influence these perceptions, such as district policies, administrator expectations, professional development opportunities, or variations in the way Section 504 is implemented at the local level. These findings highlight the need for further research to examine these additional contextual variables and their potential impact. A mixed-methods approach may offer deeper insight into school counselors' lived experiences and help identify systemic barriers to equitable access under Section 504.

Additionally, while the survey included an item designed to collect participants' race and ethnicity, a programming limitation in Qualtrics resulted in partial data that could not be fully analyzed. The responses that were collected aligned with national ASCA demographic trends, with most respondents identifying as white (ASCA, 2023b). Although the lack of complete demographic data limits our ability to examine how counselor race may influence perceptions of Section 504 implementation, future research could explore this important factor in more depth, particularly given evidence that Section 504 disproportionately benefits white, affluent students.

Finally, it is important to recognize that survey data reflect participant beliefs and perceptions, which may not always align with actual observed practices. While self-reported data provide valuable insights into how school counselors view their roles and responsibilities, these responses do not necessarily confirm how Section 504 processes are implemented in practice. Future research could incorporate triangulated data sources, such as school policy reviews, administrator perspectives, or observational studies, to better understand how Section 504 implementation aligns with school counselors' reported experiences. Expanding data collection beyond self-reporting would offer a more comprehensive picture of Section 504 management and its impact on school counseling programs.

Conclusion

This study presents preliminary findings on school counselors' (SCs') beliefs, roles, and practices related to Section 504, highlighting systemic inequities in its implementation. Despite receiving limited training in their graduate programs, SCs are often assigned case management responsibilities, leading to role confusion and detracting from their ability to provide direct student services. Additionally, significant disparities in 504 eligibility implementation between Title I and non-Title I schools further underscore inequities in access and support. This misalignment is particularly concerning as protections for students with disabilities face increasing challenges on the geopolitical stage (*Texas v. Becerra*, No. 22-cv-185, N.D. Tex.). To best support students with disabilities served under Section 504, SCs should operate within a CSCP rather than assuming dual roles that include coordination duties. Ensuring SCs are positioned to advocate effectively and provide direct services is more critical than ever. Addressing these challenges requires a realignment of SC roles, enhanced training, stronger collaboration, and advocacy for systemic equity.

ORCID ID

Robert J. Gilbert  <https://orcid.org/0009-0000-6510-778X>

Maiko Xiong  <https://orcid.org/0009-0003-7234-2712>

Erin P. Kilpatrick  <https://orcid.org/0000-0002-9095-9922>

Tiffany Wilson  <https://orcid.org/0000-0003-0419-7923>

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References

- Americans with Disabilities Act Amendments Act of 2008*, 42 U.S.C. § 12101 *et seq.* (2008).
- American School Counselor Association. (2019a). *ASCA National Model: A framework for school counseling programs* (4th ed.).
- American School Counselor Association. (2019b). *ASCA National Model: Implementation guide* (2nd ed.).
- American School Counselor Association. (2022a). *The school counselor and students with disabilities*. <https://www.schoolcounselor.org/Standards-Positions/Position-Statements/ASCA-Position-Statements/The-School-Counselor-and-Students-with-Disabilities>
- American School Counselor Association. (2022b). *ASCA ethical standards for school counselors*. <https://www.schoolcounselor.org/getmedia/44f30280-ffe8-4b41-9ad8-f15909c3d164/EthicalStandards.pdf>

- American School Counselor Association. (2023a). *The school counselor and school counseling programs*. <https://www.schoolcounselor.org/Standards-Positions/Position-Statements/ASCA-Position-Statements/The-School-Counselor-and-School-Counseling-Program>
- American School Counselor Association. (2023b, May). *Member demographics*. <https://www.schoolcounselor.org/getmedia/9c1d81ab-2484-4615-9dd7-d788a241beaf/member-demographics.pdf>
- American School Counselor Association. (2024). *The school counselor and section 504 plan and process*. <https://www.schoolcounselor.org/Standards-Positions/Position-Statements/ASCA-Position-Statements/The-School-Counselor-and-Section-504-Plan-and-Proc>
- Barri, M. (2019). A simulation showing the role of central limit theorem in handling non-normal distributions. *American Journal of Educational Research*, 7(8), 591–598. <https://doi.org/10.12691/education-7-8-8>
- Boulden, R., & Goodman-Scott, E. (2024). Initial development and validation of the school counselor 504 activities scale. *Professional School Counseling*, 28(1). <https://doi.org/10.1177/2156759X241290491>
- Brown, T. A., & Armstrong, S. A. (2022). Use of ethical decision-making models among school counselors. *Journal of Professional Counseling: Practice, Theory & Research*, 49(1), 34–45. <https://doi.org/10.1080/15566382.2022.2073176>
- Carey, J., Dimmitt, C., & Lapan, R. (2012). School counseling and student outcomes: Summary of six statewide studies. *Professional School Counseling*, 16(2), 146–153. <https://doi.org/10.5330/PSC.n.2012-16.146>
- Council for Accreditation of Counseling and Related Educational Programs. (2024). *2024 CACREP standards*. <https://www.cacrep.org/for-programs/2024-cacrep-standards/>
- Creswell, J., & Guetterman, T. (2025). *Educational research: Planning, conducting, and evaluating quantitative and qualitative research* (7th ed.). Pearson Education Limited.
- DeCino, D. A., Waalkes, P. L., & Iverson, V. (2023). Rural school counselors' experiences with dual relationships. *Journal of Child and Adolescent Counseling*, 9(3), 273–287. <https://doi.org/10.1080/23727810.2023.2195229>
- Falco, L. D., Bauman, S., Sumnicht, Z., & Engelstad, A. (2011). Content analysis of the *Professional School Counseling* journal: The first ten years. *Professional School Counseling*, 14(4), 271–277. <https://doi.org/10.1177/2156759X251316560>
- Falco, L. D., Mayes, R. D., & Hirdes, C. L. (2025). Content analysis of the *Professional School Counseling* journal: A 15-year reflection. *Professional School Counseling*, 29(1). <https://doi.org/10.1177/2156759X251316560>
- Gay, J. L. (2021). An interview with Dr. Trish Hatch: An advocate for school counseling policy. *Journal of School-Based Counseling Policy and Evaluation*, 3(1), 19–26. <https://doi.org/https://doi.org/10.25774/hcpf-hh66>
- Goodman-Scott, E. (2015). School counselors' perceptions of their academic preparedness and job activities. *Counselor Education and Supervision*, 54(1), 57–67. <https://doi.org/10.1002/j.1556-6978.2015.00070.x>
- Goodman-Scott, E., & Boulden, R. (2019). School counselors' experiences with the section 504 process: "I want to be a strong team member...[not] a case manager." *Professional School Counseling*, 23(1). <https://doi.org/10.1177/2156759X20919378>
- Goodman-Scott, E., Bobzien, J., & Milsom, A. (2018). Preparing preservice school counselors to

- serve students with disabilities: A case study. *Professional School Counseling*, 22(1), 1–11. <https://doi.org/10.1177/2156759X19867338>
- Griffith, C., & Villares, E. (2023). Research design: Quantitative approaches. In B. Zyromski & C. Dimmitt (Eds.), *School counseling research: Advancing the professional evidence base* (1st ed.). Oxford University Press. <https://doi.org/10.1093/oso/9780197650134.001.0001>
- Grothaus, T., Johnson, K. F., & Edirmamasinghe, N. (2020). *Culturally sustaining school counseling*. American School Counseling Association.
- Holler, R. A., & Zirkel, P. A. (2008). Section 504 and public schools: A national survey concerning “Section 504-only” students. *NASSP Bulletin*, 92(1), 19–43. <https://doi.org/10.1177/0192636508314106>
- Individuals with Disabilities Education Improvement Act of 2004*, 20 U.S.C. § 1400 *et seq.* (2004). <https://www.congress.gov/108/plaws/publ446/PLAW-108publ446.pdf>
- Joe, J. R., Shillingford, M. A., Aaron, S., Pharaoh, T., & Gonner, J. (2023). Sexual health and HIV prevention for youth: A survey of school counselors’ beliefs, attitudes, and professional behaviors. *Professional School Counseling*, 27(1). <https://doi.org/10.1177/2156759X231165494>
- Kahn, R. L., Wolfe, D. M., Quinn, R. P., Snoek, J. D., & Rosenthal, R. A. (1964). *Organizational stress: Studies in role conflict and ambiguity*. John Wiley & Sons.
- Kolodinsky, P., Draves, P., Schroder, V., Lindsey, C., & Zlatev, M. (2009). Reported levels of satisfaction and frustration by Arizona school counselors: A desire for greater connections with students in a data-driven era. *Professional School Counseling*, 12, 193–199. <https://doi.org/10.5330/PSC.n.2010-12.193>
- Lapan, R. (2012). Comprehensive school counseling programs: In some schools for some students but not in all schools for all students. *Professional School Counseling*, 16(2), 84–88. <https://doi.org/10.1177/2156759X12011600201>
- Lewis, M. M., & Muñiz, R. (2023). *Section 504 plans: Examining inequitable access and misuse*. National Education Policy Center. <https://nepc.colorado.edu/publication/504-plan>
- 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>
- Lovett, B. J. (2020). Disability identification and educational accommodations: Lessons from the 2019 admissions scandal. *Educational Researcher*, 49(2), 125–129. <https://doi.org/10.3102/0013189X20902100>
- Madaus, J. W., & Shaw, S. F. (2008, May). The role of school professionals in implementing section 504 for students with disabilities. *Educational Policy*, 22, 363–378. <https://doi.org/10.1177/0895904807307069>
- Milsom, A. S. (2002). Students with disabilities: School counselor involvement and preparation. *Professional School Counseling*, 5(5), 331–338. <https://www.jstor.org/stable/42732373>
- National Center for Education Statistics. (2024). *Students with disabilities*. U.S. Department of Education, Institute of Education Sciences. <https://nces.ed.gov/programs/coe/indicator/cgg>
- Nichter, M., & Edmonson, S. (2005). Counseling services for special education students. *Journal of Professional Counseling, Practice, Theory, & Research*, 33(2), 50–62. <https://doi.org/10.1080/15566382.2005.12033817>
- Niles, J. K. (2022). Practice into policy and policy into practice: An interview with Dr. Carol

- Dahir. *Journal of School-Based Counseling Policy and Evaluation*, 3(1), 19-26.
<https://doi.org/10.25774/w51x-fd67>
- O’Laughlin, L., & Lindle, J. C. (2015). Principals as political agents in the implementation of IDEA’s least restrictive environment mandate. *Educational Policy*, 29(1), 140-161.
<https://doi.org/10.1177/0895904814563207>
- Poynton, T. (2023). Using assessment instruments in school-based research. In B. Zyromski & C. Dimmitt (Eds.), *School counseling research: Advancing the professional evidence base* (1st ed.). Oxford University Press. <https://doi.org/10.1093/oso/9780197650134.001.0001>
- Printy, S. M., & Williams, S. M. (2015). Principals’ decisions: Implementing response to intervention. *Educational Policy*, 29(1), 179-205.
<https://doi.org/10.1177/0895904814556757>
- Rehabilitation Act of 1973*, § 504, 29 U.S.C. § 794 (1973).
- Romano, D. M., Paradise, L. V., & Green, E. J. (2009). School counselors’ attitudes towards providing services to students receiving Section 504 classroom accommodations: Implications for school counselor educators. *Journal of School Counseling*, 7(37).
<http://www.jsc.montana.edu/articles/v7n37.pdf>
- Savitz-Romer, M., & Nicola, T. P. (2022). An ecological examination of school counseling equity. *The Urban Review*, 54(2), 207-232. <https://doi.org/10.1007/s11256-021-00618-x>
- Swank, J. M., Smith-Adcock, S., & Weaver, J. L. (2019). School counselors’ roles and responsibilities in bullying prevention: A national survey. *Professional School Counseling*, 22(1), 1-11. <https://doi.org/10.1177/2156759X19851465>
- Texas v. Becerra*, No. 5:22-CV-185-H, 2022 WL 3639525 (N.D. Tex. Aug. 23, 2022)
- U.S. Department of Education, Office for Civil Rights. (2016). *Dear colleague letter and resource guide on students with ADHD*. <https://www.ed.gov/media/document/dear-colleague-letter-and-resource-guide-students-adhd-2016-35074.pdf>
- U.S. Department of Education, Office for Civil Rights. (2024). *Profile of students with disabilities in U.S. public schools during the 2020–21 school year*. Civil Rights Data Collection. <https://www.ed.gov/media/document/crdc-snapshot-profile-of-students-disabilities-us-public-schools-sy-2020-2021-21420.pdf>
- Warner, R. M. (2013). *Applied statistics: From bivariate through multivariate techniques* (2nd ed.). Sage Publications.
- Watkinson, J. S., Goodman-Scott, E. C., Martin, I., & Biles, K. (2018). Counselor educators experiences preparing preservice school counselors: A phenomenological study. *Counselor Education and Supervision*, 57(3), 178–193.
<https://doi.org/10.1002/ceas.12109>
- Young, T., & Lewis, W. D. (2015). Educational policy implementation revisited. *Educational Policy*, 29(1), 3-17. <https://doi.org/10.1177/0895904815568936>
- Zirkel, P. A., & McGuire, B. L. (2010). A roadmap to legal dispute resolution for students with disabilities. *Journal of Special Education Leadership*, 23(2), 100-112.
<https://scispace.com/pdf/a-roadmap-to-legal-dispute-resolution-for-students-with-o2vt82cyy7.pdf>
- Zirkel, P. A. (2011). Counterpoint introduction – Does section 504 require a section 504 plan for each eligible non-IDEA student? *Journal of Law and Education*, 40(3), 407–416.
<https://scholarcommons.sc.edu/jled/vol40/iss3/2>
- Zirkel, P. A., & Weathers, J. M. (2016). K–12 students eligible solely under section 504: Updated national incidence data. *Journal of Disability Policy Studies*, 27(2), 67–75.

<https://doi.org/10.1177/1044207315626115>

Zirkel, P. A. (2023). How good must a 504 plan be to pass legal muster? *Journal of Special Education Leadership*, 36(1), 43-51. <https://perryzirkel.com/wp-content/uploads/2023/03/zirkel-jsel-article-substantive-std.-for-504-plans.pdf>

Zirkel, P. A., & Gullo, G. L. (2024). Public school rates of § 504-only students: The latest update. *Education Law Reporter*, 420(1), 1–12. <https://perryzirkel.com/wp-content/uploads/2024/05/zirkel-and-gullo-school-504-rates-article.pdf>