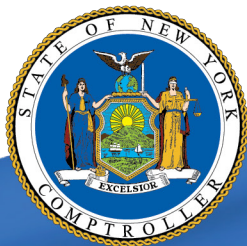


Coxsackie-Athens Central School District

Mental Health Training Component of the New York SAVE Act

JUNE 2022



OFFICE OF THE NEW YORK STATE COMPTROLLER
Thomas P. DiNapoli, State Comptroller

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Report Highlights

Coxsackie-Athens Central School District

Audit Objective

Determine whether the Coxsackie-Athens Central School District (District) used District resources to provide the mental health component of the New York Safe Schools Against Violence in Education Act (SAVE Act) training requirement to staff.

Key Findings

The District did not provide mental health training as required to all staff for the 2020-21 school year by September 15, 2020.

- None of the 34 employees' records we tested showed the training was completed by September 15, as required by New York State Education Department (SED) regulations.
- Five of the 12 recommended components of mental health that educators should know were not included in the District's training.

Key Recommendation

Provide mental health training to all staff and ensure it is completed by September 15, as required. Such training should address recognition of the warning signs, whom to turn to for assistance, and how to access appropriate services.

District officials agreed with our recommendation and indicated they will take corrective action.

Background

The District is located in Greene County, and is governed by an elected nine-member Board of Education (Board).

The Board is responsible for the general management of the District.

The Superintendent serves at the Board's direction and is responsible for day-to-day management.

The Assistant Superintendent of School Services was designated as the Chief Emergency Officer and was responsible for coordinating the emergency plan training for staff.

Quick Facts

2020-2021 School Year

Staff	325
Students	1,188
Staff Training Records Tested	34
School Buildings	2

Audit Period

July 1, 2020 – June 30, 2021

As described in Appendix B, for certain training material review we extended the audit period.

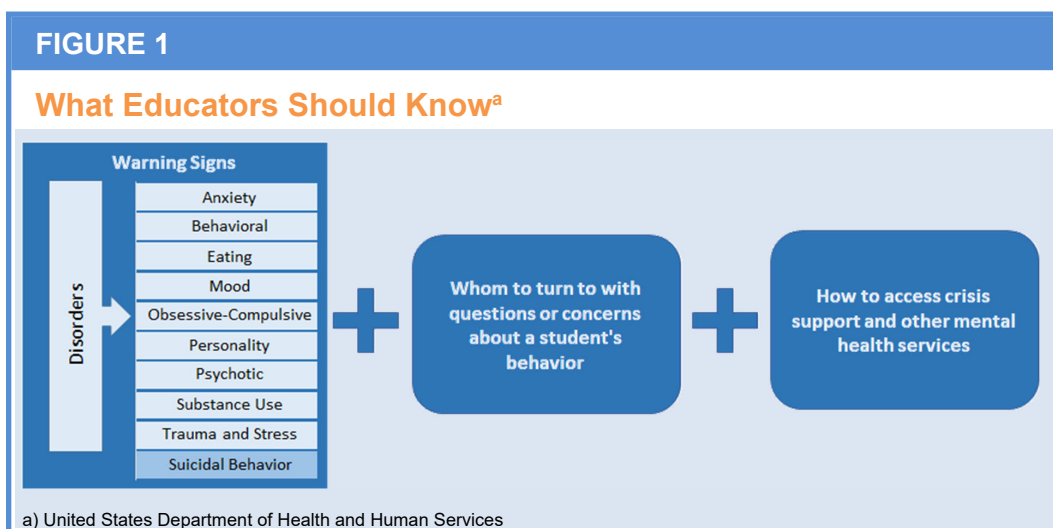
Mental Health Training

The SAVE Act was introduced to help improve school safety. The SAVE Act requires school districts to develop a comprehensive district-wide school safety plan (safety plan) that addresses crisis intervention, emergency responses and management. The safety plan developed by each district must include, among other things, policies and procedures for annual school safety training for staff and students. School districts must certify to the SED Commissioner that all staff have undergone the school safety training, which must include a component on mental health.¹ SED requires that the certification to the SED Commissioner states that all staff have undergone the annual training by September 15 of each year.

What Is the Mental Health Component of the SAVE Act Training for All Staff?

The SAVE Act requires all districts to provide staff annual emergency response plan training with a component on mental health. School personnel are often the first to notice mental health problems, and, to support the mental health of a district's students.

While the SAVE Act and SED requirements state that the annual school safety training must include a component on mental health, neither the SAVE Act nor SED requirements directly address what topics should be included within the mental health training component. Rather, SED issued guidance to all school districts that included resources relating to mental health. Included within the resources was information from the U.S. Department of Health and Human Services (DHHS) addressing "what educators should know" regarding warning signs of mental health problems, "whom to turn to," and "how to access crisis support and other mental health services" (Figure 1).



1 8 NYCRR Section 155.17[c][1][xiii]

Based on SED guidance, as a best practice, at a minimum staff should be trained on the DHHS recommended mental health components of “what educators should know.”

District Training Did Not Include All Recommended Mental Health Components

The Superintendent certified to SED that by September 23, all staff received the training on the emergency response plan, which included a component of mental health.

We reviewed the District’s “School Emergency Response Plans, Schools Against Violence in Education, Portable Fire Extinguishers” (SAVE) training module and found seven of 12 recommended mental health components were included. Missing from the training module were how to access crisis support and other mental health services and the warning signs such as eating disorders, substance abuse disorders, obsessive-compulsive disorder and psychotic disorders (Figure 2).

Figure 2: District’s SAVE Training Module

Mental Health Components	Included
Whom to Turn to	✓
How to Access Support and Services	X
Warning Signs	
Anxiety Disorders	✓
Behavioral Disorders	✓
Eating Disorders	X
Mood Disorders	✓
Obsessive-Compulsive Disorder	X
Personality Disorders	✓
Psychotic Disorders	X
Substance Use Disorders	X
Suicidal Behavior	✓
Trauma and Stress Related Disorders	✓

The Chief Emergency Officer told us the District’s SAVE training module included some mental health components and that the District spreads out additional mental health trainings during the school year. She believed all the missing components would have been covered during the school year. However, SAVE Act mental health training must be completed by September 15 of each school year, prior to filing a certification with SED that all trainings were provided to staff.

District officials also told us two other trainings (Sexual Harassment and COVID Safety) were provided to staff as part of the District’s required mental health training component. The Sexual Harassment training material included one warning sign: trauma and stress related disorders. We were told the COVID Safety training, a video presentation, contained additional mental health components. However, the Assistant Superintendent of Curriculum (Assistant

Superintendent) was unable to provide the material for our review. Regardless, the training material available focused on sexual harassment, not mental health disorders or behaviors. Rather, the content trained attendees to recognize the signs of sexual harassment specific to students.

The District Did Not Provide Training to All Staff by September 15

Officials told us they provided the required District SAVE training to all staff. We tested District records for 34 of the 325 staff to determine if the SAVE training that included mental health components was completed by September 15, 2020, as required. None of the 34 employees' records, which included the Superintendent, Principals, Counselors, Teachers, Teacher Assistants, Teacher Aides, Nurses, Food Service, and Custodians showed the SAVE training was completed by September 15.

The Assistant Superintendent told us employees were notified of training availability on August 24, 2020, and that employees were given a deadline to complete the training by the end of September 2020. As part of the monitoring process, email reminders are used to follow up with employees who had not completed the training. The Chief Emergency Officer told us the deadline was extended to September 23 to complete the SAVE training module because of the COVID-19 pandemic. However, the Regulation related to the SAVE Act does not provide for any extensions.

It is imperative, especially during the COVID-19 pandemic, that staff be provided training on warning signs that may be an early indicator of mental health issues and concerns. Training staff can assist in identifying mental health issues in students early on to get help when needed and potentially avoid having to react to crisis situations or emergencies.

What Do We Recommend?

District officials must:

1. Provide mental health training to all staff and ensure it is completed by September 15, as required. Such training should address recognition of the warning signs, whom to turn to for assistance, and how to access appropriate services.

Appendix A: Response From District Officials



District Office
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COXSACKIE-ATHENS CENTRAL SCHOOL DISTRICT

February 11, 2022

Julie Landcastle, Chief Examiner
Statewide Audit
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44 Hawley Street
Binghamton, NY 13901-4417

Ms. Landcastle,

The district has reviewed the draft findings for the draft Mental Health Audit Report. The district will comply with the September 15th deadline to provide mental health training for all employees.

The district wants to acknowledge that year in question, 2020-2021 was the beginning of returning to full time in-person learning for our district. Our time and resources were concentrated on preparing to open and providing a safe learning environment for employees and schools.

The district will also be advocating for the annual deadline of September 15 to be changed to allow school districts to provide sustained year long training instead of "one and done" as the current legislation drives schools to do.

Sincerely,

Randall W. Squier
Superintendent of Schools

C Board of Education

Appendix B: Audit Methodology and Standards

We conducted this audit pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law. To accomplish our audit objective and obtain relevant audit evidence, our procedures included the following steps:

- We selected the District for audit using a random number generator applied to a list of districts, broken out by five geographic regions (excluding NYC schools), not currently in the OSC audit process at the time of selection. The list was broken out by geographic region for an even representation of school districts across the State for this multi-unit audit.
- We interviewed District officials to gain an understanding of the process for creating, disseminating, and monitoring mental health training for staff. We interviewed District officials to gain an understanding of the District's computer systems used for creating, disseminating, and monitoring mental health training provided to staff.
- We reviewed relevant State laws and regulations, and guidance from SED and the United States Department of Health and Human Services. We reviewed District policies to gain an understanding of required mental health training.
- We reviewed Board minutes for the 2020-21 school year to determine the Board action taken related to the District-wide safety plan or required mental health training.
- We requested and reviewed records supporting the District's 2020-21 certification to SED that required annual training with a component of mental health were provided to staff.
- We reviewed and tested the mental health training materials provided by the District to determine if training on mental health followed recommended United States Department of Health and Human Services guidance. We documented when training materials were not retained by the District. We extended the scope forward to August 19, 2021 to include the date the auditor observed training material – Sexual Harassment (2021-22 presentation).
- We determined the total number of individuals employed by the District during our audit period, by obtaining and reviewing an employee listing.
- Using the District's employee listing we grouped all employees by job type, specific (Superintendent, Principal, Assistant Principal and Counselors), teachers and other staff. We used a bias selection method and random number generator to select a sample of 34 employees, consisting of 10 specific, 12 teachers and 12 staff, to determine whether employees completed required trainings according to job titles. Employees hired on or after July 1, 2020 and employees who left the District prior to September 15, 2020 were not included in the sample.

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Unless otherwise indicated in this report, samples for testing were selected based on professional judgment, as it was not the intent to project the results onto the entire population. Where applicable, information is presented concerning the value and/or size of the relevant population and the sample selected for examination.

The Board has the responsibility to initiate corrective action. A written corrective action plan (CAP) that addresses the findings and recommendations in this report must be prepared and provided to our office within 90 days, pursuant to Section 35 of General Municipal Law, Section 2116-a (3)(c) of New York State Education Law and Section 170.12 of the Regulations of the Commissioner of Education. To the extent practicable, implementation of the CAP must begin by the end of the fiscal year. For more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. The CAP should be posted on the District's website for public review.

Appendix C: Resources and Services

Regional Office Directory

www.osc.state.ny.us/files/local-government/pdf/regional-directory.pdf

Cost-Saving Ideas – Resources, advice and assistance on cost-saving ideas

www.osc.state.ny.us/local-government/publications

Fiscal Stress Monitoring – Resources for local government officials experiencing fiscal problems

www.osc.state.ny.us/local-government/fiscal-monitoring

Local Government Management Guides – Series of publications that include technical information and suggested practices for local government management

www.osc.state.ny.us/local-government/publications

Planning and Budgeting Guides – Resources for developing multiyear financial, capital, strategic and other plans

www.osc.state.ny.us/local-government/resources/planning-resources

Protecting Sensitive Data and Other Local Government Assets – A non-technical cybersecurity guide for local government leaders

www.osc.state.ny.us/files/local-government/publications/pdf/cyber-security-guide.pdf

Required Reporting – Information and resources for reports and forms that are filed with the Office of the State Comptroller

www.osc.state.ny.us/local-government/required-reporting

Research Reports/Publications – Reports on major policy issues facing local governments and State policy-makers

www.osc.state.ny.us/local-government/publications

Training – Resources for local government officials on in-person and online training opportunities on a wide range of topics

www.osc.state.ny.us/local-government/academy

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