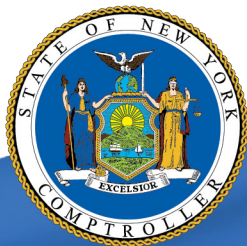


Harborfields Central School District

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

Harborfields Central School District

Audit Objective

Determine whether the Harborfields 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.

- 64 of the 72 employees' records we tested showed the training was not completed by September 15, as required by New York State Education Department (SED) regulations.
- Ten 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. Appendix B includes our comment on the District's response.

Background

The District is located in Suffolk County, and is governed by an elected seven-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 Superintendent is the Chief Emergency Officer and is responsible for coordinating emergency plan training for staff.

Quick Facts

2020-2021 School Year

Staff	723
Students	2,925
Staff Training Records Tested	72
School District Buildings	4

Audit Period

July 1, 2020 – June 30, 2021

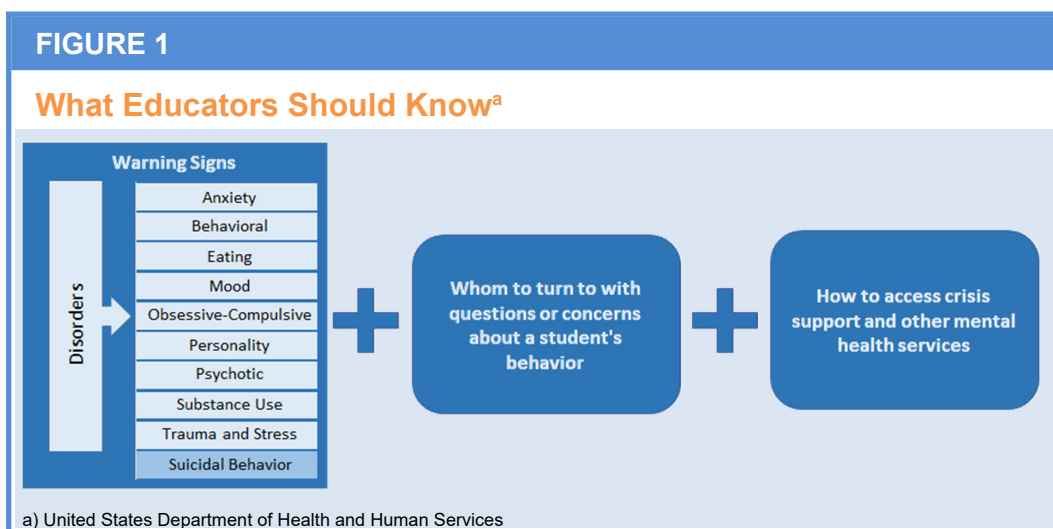
Mental Health Training

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 all staff received training on the emergency response plan on September 3, 2020, which must also include training on a component of mental health.

We reviewed the District’s Suicide Prevention training and found two of 12 recommended mental health components were included. Missing from the training were how to access crisis support and other mental health services and the warning signs for anxiety disorders, behavioral disorders, eating disorders, mood disorders, obsessive-compulsive disorder, personality disorders, psychotic disorders, substance use disorders, and trauma and stress related disorders (Figure 2).

Figure 2: District’s Suicide Prevention Training

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

The Superintendent told us prior to the 2020-21 school year, the District would present a training during the Superintendent’s Conference Day that would include all employees and focused on all the Department of Health’s mental health recommendations. However, officials told us as a result of the COVID-19 pandemic, its training efforts shifted on COVID-19 safety protocols.

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

Officials told us they provided the Suicide Prevention training to all staff. We tested District records for 72 of the 723 staff to determine if the Suicide Prevention training that included a mental health component was completed by September 15, 2020, as required. We found eight of the 72 employees’ training

records indicated training was completed by September 15. Records for 64 of the 72 employees', which included the Superintendent, Principals (2), Assistant Principals (4), Guidance Counselors (8), teaching staff (21), and other non-instructional employees (28) showed training was not completed by September 15.

The Superintendent told us the District's deadline for completing the Suicide Prevention training was extended to December 31, 2020 due to 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



Harborfields Central School District

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Rory J. Manning, Ed.D.
Superintendent of Schools

Gina Inglese
District Clerk

Julie Landcastle, Chief Examiner
Statewide Audit
State Office Building, Suite 1702
44 Hawley Street
Binghamton, NY 13901-4417

February 11, 2022

Dear Ms. Landcastle,

The Harborfields Central School District is in receipt of the Draft Mental Health Training Audit Report of Examination for the period of July 1, 2020 through June 30, 2021. On behalf of the Board of Education and the District administrative team, we would like to thank the Comptroller's staff for their professionalism and courtesy in conducting their duties associated with this audit.

The Harborfields Central School District is committed to providing an innovative educational program where all students are empowered to realize their unique potential while striving for academic excellence. The District welcomes the opportunity to review and strengthen our policies, practices and protocols in all aspects of our operation, especially our obligation to provide mental health training to our staff in support of our students. To that end, we have developed and adopted a district safety plan annually that includes the requirement for staff to be trained in alignment with the mental health component of the New York Safe Schools Against Violence in Education (SAVE) Act.

The audit report focused on the District's obligation to provide mental health training to staff by September 15, 2020. As stated in the draft audit report, the District did not provide mental health training as required to all staff by September 15, 2020. It is the District's position that context of the time period in and around September 15, 2020, is relevant. Like all schools across New York State, the District was welcoming students and staff back from a mandated shutdown beginning on March 13, 2020. Schools were grappling with frequent changes to guidance and regulations including, but not limited to, the following items related to the operation of our schools;

- Development of in-person, hybrid, and remote instructional models,
- Altering student schedules to meet minimum social distancing requirements,
- Meeting recommendations for increased sanitizing and disinfecting of the schools,
- Developing one-way directional hallways and stairwells,

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Suzie Lustig, President
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-
- Repurposing spaces within each building to increase social distancing during lunch periods,
 - Analyzing and modifying building equipment to meet increased ventilation recommendations,
 - Enacting daily health screening of students and staff,
 - Providing food service for in-person and remote students,
 - Developing quarantine protocols for students and staff,
 - Procuring and distributing hundreds of digital devices for students and staff,
 - Training students, staff, and parents on the use of digital hardware and software, and,
 - Procuring and distributing personal protective equipment (PPE) for students and staff such as face masks, face shields, and desk barriers.

The staff of the Harborfields Central School District entered the doors of our schools to an entirely new instructional environment the likes of which have never been seen in the history of PK – 12 schooling. The priority of the district during the opening days of the school year was to train staff to ensure the health and safety of our school community during those unprecedented times. We hope this context is referenced in the global report that will be issued by the Office of the State Comptroller (OSC) where it will be disclosed that none of the 20 districts across New York State that were involved in this audit met the mental health training requirements for this time period.

The District fully supports the need for ongoing mental health training for staff. In fact, the Board of Education and District administration continue to advocate for increased funding and support for mental health education and services as we have done prior to the pandemic. The officials who were on site from the OSC had the opportunity to review our annual mental health training that is provided to our staff each school year. We appreciate that the officials indicated that this training meets all required components mandated by the SAVE legislation. The District continues to provide this training to our staff annually.

See Note 1 Page 8

Comptroller Recommendation:

District officials must 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 Response:

The District accepts the Comptroller’s recommendation and will provide the mental health training to all staff prior to September 15 of each year. The District will also ensure that the annual training meets or exceeds the recommended components such as the recognition of warning signs, whom to turn to for assistance, and how to access appropriate services.

Conclusion:

We would like to thank the Comptroller's Office for their thoroughness and professionalism over the course of the time they spent with the District administration of the Harborfields Central School District. Although the District's resources were understandably focused on the safe and effective re-opening of our schools to students and staff during the time leading up to September 15, 2020, the District is nonetheless in agreement with the Comptroller's recommendation, and, as such, the district is fully committed to providing the annual mental health training by September 15th. We continue to take great pride with our history of support for the mental wellness of the students and staff of the Harborfields Central School District.

Sincerely,

Suzie Latsig
President, Board of Education

Rory J. Manning, Ed.D.
Superintendent of Schools

Appendix B: OSC Comment on the District's Response

Note 1

Training provided during our audit period included two of the 12 recommended mental health components. Warning signs include ten mental health components and are detailed in Figures 1 and 2 of this report. Although the Superintendent told us the District presented training prior to the 2020-2021 school year that included all mental health components, we did not review or opine on this training as it did not fall within the scope of our audit nor was it provided each year, as required.

Appendix C: 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.
- 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 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 72 employees (10 percent), consisting of 16 specific, 28 teachers and 28 staff, to determine whether employees completed required trainings according to job titles. Employees hired after 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 letter, 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 the relevant population size 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 D: 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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