

Livonia 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

Livonia Central School District

Audit Objective

Determine whether the Livonia 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 to all staff for the 2020-21 school year by September 15, 2020 as required by New York State Education Department (SED) regulations.

- Nine of the 12 recommended components of mental health that educators should know were not included in the District's training.

District officials did not maintain documentation to support attendance for training and we were unable to determine which staff members participated in the 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 Livingston and Ontario Counties 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 Middle/High School Principal is designated as the Chief Emergency Officer and is responsible for coordinating emergency plan training for staff.

Quick Facts

2020-2021 School Year

Staff	452
Students	1469
School Buildings	2

Audit Period

July 1, 2020 – June 30, 2021

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

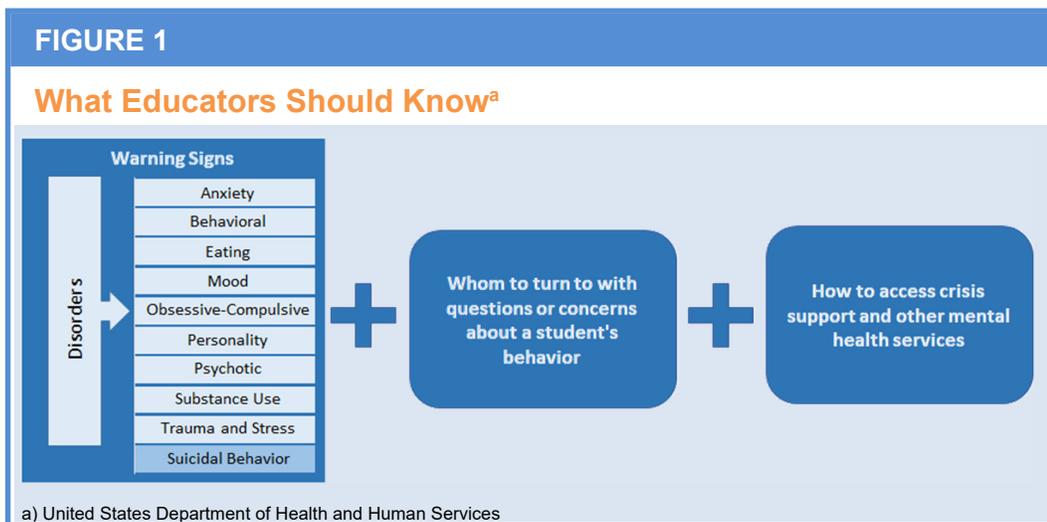
Mental Health Training

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 and Training Was Not Provided to All Staff

The Superintendent certified to SED that all staff received training on the emergency response plan on September 1, 2020, which must also include training on a component of mental health.

The District provided training on the topics of cyberbullying through an on-line course and suicide safety through a video conference to staff and District officials told us they contained a component of mental health training.

We reviewed the District’s suicide safety training and found three of 12 recommended mental health components were included. Missing from the training were the warning signs such as anxiety disorders, behavioral disorders, eating disorders, mood disorders, obsessive-compulsive disorder, personality disorders, psychotic disorders, substance abuse disorders and trauma and stress related disorders. (Figure 2).

We were told the training was not offered to all staff, rather only to the Middle-High School teachers and teacher’s assistants. There is no documentation that staff were trained on any of the 12 recommended components of mental health that educators should know.

The Chief Emergency Officer told us that this training was provided on September 1, but documentation to support attendance for the suicide safety training was not maintained. Therefore, which staff members participated in the training could not be determined. In addition, we did not consider the content of the cyberbullying

Figure 2: District’s Suicide Safety Training

Mental Health Components	Included
Whom to Turn to	✓
How to Access Support and Services	✓
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

training to satisfy the requirement on providing training on a component of mental health because it focused on recognizing cyberbullying and its effects, not mental health disorders or behaviors.

The Superintendent told us that in the past, additional training may have been offered to meet the requirements; however, the impact of the COVID-19 pandemic shifted priorities and that the focus was on reopening school for five-day, in-person school weeks.

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

LIVONIA Central School District

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January 25, 2022

Julie Landcastle, Chief Examiner
Statewide Audit
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RE: Livonia Central School District's Audit Response Letter and Corrective Action Plan in response to Report of Examination (S9-21-22)

Dear Ms. Landcastle,

Livonia Central School District is in receipt of the Report of Examination (S9-21-22) for the period of July 1, 2020 to June 30, 2021 regarding the mental health component of the New York Safe Schools Against Violence in Education Act (SAVE Act). Please accept this letter as the District's response to the audit and the District's corrective action plan as approved by the Board of Education on January 24, 2022.

In general, the district agrees with the findings and recommendations outlined in the report. When schools across the state closed in March of 2020, Livonia CSD focused on connecting with and supporting our students and families. Every student received a weekly phone call from a school staff member to check in and ensure their needs were being met. This continued into the summer of 2020. As we entered into the audit period (2020-2021 school year), Livonia CSD focused on reopening five days a week. The most important task we could take on for the well-being of our students was to open school in-person five days a week and remain open five days a week throughout the entirety of the 2020-2021 school year. Our focus on the well-being and mental health of our students has never relented and we appreciate the OSC's work across the state to bring focus to a topic that Livonia CSD cares deeply about.

In response to **Comptroller Recommendation #1**, the District initiated the following **corrective action plan** in June of 2021:

The District added the Student Mental Health training to our required annual training list for all staff. The Assistant Superintendent of Finance and Human Resources will ensure all staff has completed the training by September 15 of each school year and notify both the Superintendent and Chief Emergency Officer as to the status of completions prior to SED certification.

On behalf of the Livonia Central School District, I would like to extend our thanks to the OSC for the work they do and for the professionalism of the team of auditors who spent time Livonia.

Sincerely,

Matthew Cole
Superintendent of Schools

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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 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 guidance. We extended the scope forward to August 12, 2021 to include the date the auditor observed training material – suicide safety training.
- We determined the total number of individuals employed by the District during our audit period by obtaining and reviewing an employee listing.

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.

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

Contact

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