

West Genesee 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

West Genesee Central School District

Audit Objective

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

- Seven 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.

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 Onondaga 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 Superintendent is the Chief Emergency Officer and is responsible for coordinating emergency plan training for staff.

Quick Facts

2020-2021 School Year

Staff	1,147
Students	4,349
School Buildings	7

Audit Period

July 1, 2020 – June 30, 2021
As described in Appendix B, for certain training material review we extended the audit period.

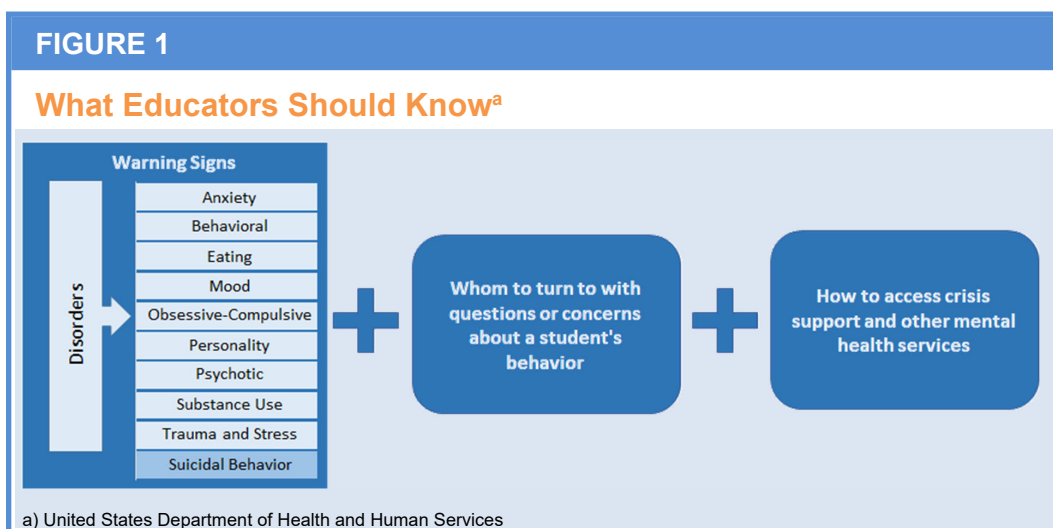
Mental Health Training

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 all staff received training on the emergency response plan on September 2, 2020, which must also include training on a component of mental health.

We reviewed the District’s “The First Days Back – Social Emotional Learning” (SEL) training to be completed by all staff and found five of 12 recommended mental health components were included. Missing from the training were whom to turn to, how to access support and services, and the warning signs such as eating disorders, mood disorders, obsessive-compulsive disorder, personality disorders and psychotic disorders (Figure 2).

The Assistant Superintendent for Curriculum and Instruction (Assistant Superintendent) disseminated an email on September 1 that included a link to the training. However, the Assistant Superintendent told us documentation to support attendance for the training was not maintained. Therefore, which staff members completed the training could not be determined. The Superintendent told us he was unaware of the insufficiency of documentation supporting staff participation.

Furthermore, the Superintendent told us one of the District’s librarians disseminated an email on August 31, 2020 that contained a link to mental health resources maintained on a District high school website (District Web Resources). We reviewed the District Web Resources and found it included all the recommended mental health components. However, the librarian told us the District Web Resources were disseminated only to the high school staff. Further,

Figure 2: District’s “The First Days Back – Social Emotional Learning” (SEL) Training

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

the Superintendent told us there was no requirement to review or attest to having reviewed the material. Therefore, which staff members completed the review of the District Web Resources could not be determined.

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

West Genesee Central School District

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David V. Cirillo
Director of Staff Relations

February 11, 2022

Ms. Julie Landcastle, Chief Examiner
Statewide Audit
State office Building, Suite 1702
Binghamton, NY 13901-4417

Dear Ms. Landcastle:

Mental Health Training Audit Response

Since its early adoption in 2000, and its subsequent amendments, the West Genesee Central School District ("District") has been, and is, a strong proponent of the New York State SAVE legislation. Notwithstanding the SAVE Act and its mandates, mental health awareness is a top priority for the District. The District places a strong emphasis on individual well-being. To that end, the District has provided multiple opportunities for employees to get not just the mandated training, but additional training and resources beyond the requirements of the SAVE legislation.

Outside of the Mental Health Training Audit ("Audit") period of July 1, 2020 through June 30 2021, the District has provided in-person or virtual training on mental health from qualified District trainers or training via services through the Onondaga Cortland Madison BOCES ("OCM BOCES"). During the Audit period, the challenge the District was faced with, similar to other school districts, was that staff was not available to attend in-person training. As such, the District provided virtual opportunities to staff to participate in various trainings.

The Audit found that the District's "The First Days Back – Social Emotional Learning" training that was to be completed by all staff only had five of the twelve mental health training components. However, the District avers that this training was not a complete substitute for the actual in-person training. This was only one of the many other training opportunities. In fact, the Audit found that other training resources were available on the District's website which had all the necessary mental health components. The deficiency, as identified in the Audit, was that the district only disseminated the resources to the High School staff, and there was no mechanism to track who actually reviewed the material.

Equally important, and not identified in the Audit, is that the District participated, and continues to participate, in the Employee Assistance Program ("EAP"). Throughout the Audit period, and even outside of that period, the District disseminated to all staff information and training on all aspects of mental health which included information above and beyond the mandatory training. Especially in light of the pandemic, the District routinely (monthly) would send information to its staff through its EAP program. However, though this was a significant resource to employees, legally the District could not track who participated in any of the EAP trainings or services.

Ms. Julie Landcastle, Chief Examiner
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Corrective Action Plan

Prior to the Audit, the District identified the shortcomings of District provided virtual trainings; primarily, how could the District provide and track which employees participated in the training. To address this issue, especially with the uncertainty of how the subsequent school year (2021-2022) would operate during the continued pandemic, the District made a decision that mandatory trainings will now be provided via services through OCM BOCES. The method to provide this training is virtual. All training, including the mandatory health training, is provided by qualified OCM BOCES trainers. The District can now not only disseminate the training (training links) to all staff, but it can identify who actually received the training. The OCM BOCES maintains training records on behalf of the District. This was all in place as a self-corrective measure prior to the District being audited, or even aware that it was subject to this Audit. As of September of 2021, all District staff were directed to participate in these trainings, and all mental health training is in compliance with the SAVE Act.

Respectfully,

David V. Cirillo
Director of Staff Relations

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 DHHS. 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 October 26, 2021 to include the date the auditor observed training material – "The First Days Back – Social Emotional Learning" and District Web Resources.
- 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 next 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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