

Crown Point 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

Crown Point Central School District

Audit Objective

Determine whether the Crown Point 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 per New York State Education Department (SED) regulations.

- Only instructional staff were required to complete mental health training.
- Three of the 12 recommended components of mental health that educators should know were missing from the District's training.

Documentation to support attendance for the training was not maintained 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 Essex 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	70
Students	320
School Buildings	1

Audit Period

July 1, 2020 – June 30, 2021

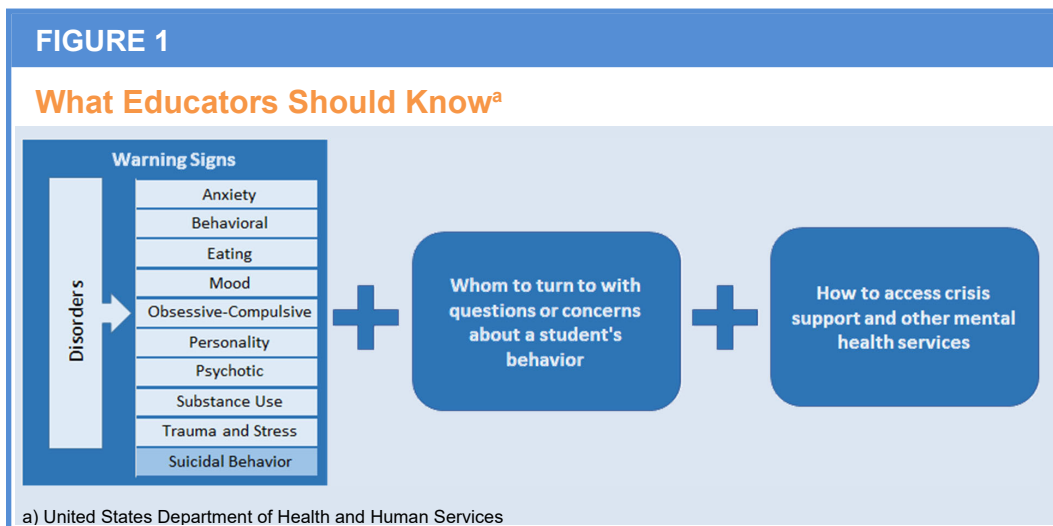
Mental Health Training

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.

The Chief Emergency Officer told us a training that included mental health content was provided in the District’s SEL (Social Emotional Learning) Updates training on September 1.

We reviewed the District’s documentation, which included the SEL Updates presentation and attachments, and found nine of the 12 recommended mental health components were included. Missing from the training were the warning signs for anxiety disorders, eating disorders and psychotic disorders (Figure 2).

The Guidance Counselor could not provide an explanation of why mental health components for eating disorders were omitted from the training materials provided. She also told us that she did not consider including the topic of psychotic disorders in the training as it was beyond a school counselor’s role. In addition, she told us anxiety was mentioned in a suicide prevention part of the training; however, warning signs specific to anxiety disorders were not included.

Figure 2: District’s SEL Updates Training

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

The District Did Not Provide Training to All Staff

The Chief Emergency Officer told us training was provided in-person to instructional staff, through the SEL Updates training presentation by the District's guidance counselor on September 1. Documentation to support attendance for the training was not maintained. Therefore, which staff members participated in the training could not be determined.

The Chief Emergency Officer told us that in a typical year, all District staff are required to attend the mental health and emergency response plan training. However, due to the COVID-19 pandemic and a scheduling conflict with the Guidance Counselor, the mental health training was moved to a training day which was only required for instructional staff. Consequently, although all staff were invited to attend, not all staff were in attendance.

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

Crown Point Central School

P.O. Box 35, 2758 Main Street
Crown Point, NY 12928
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Home of the Panthers

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January 20, 2022

Office of the State Comptroller
One Broad Street Plaza
Glens Falls, NY 12801

Office of the State Comptroller
District of Local Government & School Accountability
PSU-CAP Submission
110 State Street, 12th Floor
Albany, NY 12236

RE: Combined Audit Response and Corrective Action Plan (CAP)

Unit Name: Crown Point Central School
Report Title: Mental Health Training as part of SAVE Act
Audit Report Number: S9-21-26

Dear Office of the State Comptroller:

Please allow this letter to serve as the Crown Point Central School District's Combined Audit Response letter and our Corrective Action Plan, (CAP).

Audit Response:

It is the position of the Crown Point Central School District that we generally agree with the audit findings of the OSC. We will strengthen our annual Mental Health training to include all staff and meet the 12 components outlined in the SAVE Act. This will be a priority when planning for our Staff Development in early September.

Corrective Action Plan:

For each of the two recommendations included in the audit report, the following is our corrective action(s) taken or proposed.

Audit Recommendation:

1) Include all Mental Health Components of SAVE Act:

The Superintendent/Chief Emergency Officer will make sure when providing training/s for Staff Development previous to September 15th that all 12 of the following components are met:

- **Whom to turn to**
- **How to access support and service**
- **Anxiety disorders**
- **Behavioral disorders**
- **Eating disorders**
- **Mood disorders**
- **Obsessive/Compulsive disorders**
- **Personality disorders**
- **Psychotic disorders**
- **Substance Use disorders**

-
- Suicidal disorders
 - Trauma & Stress related disorders

2) Include all instructional & non-instructional staff in Mental Health Training prior to September 15th:

The Superintendent /Chief Emergency Officer will make sure all staff, regardless of job association, will be part of the required training on Mental Health as per the SAVE Act previous to September 15th.

Implementation Plan of Action(s):

All staff attendance will be mandatory, the training will be videoed and an official sign in sheet will accompany the training. If staff are unable to attend on the given day of the training, it will be noted. Those staff member/s will be required to watch on their own time and sign off on its viewing.

Implementation Date of Recommendations:

For each new school year beginning September 1, 2022 and by September 15, 2022: Mental Health Training on SAVE Act for All Staff

Person Responsible for Implementation:

The Superintendent is responsible for the overall implementation and approval of staff development planning and implementation.

Signed:

Shari L. Brannock
Superintendent of Schools

In summary of the above and the audit recommendations found on page 6 of the Report of Examination for the Audit, Crown Point Central School District will provide a complete and thorough training on the 12 Mental Health components of the SAVE Act and include all staff each school year. The training will be previous to September 15th per NYS guidelines.

In addition, the auditor's guidance found on page 5 of the Report states, "it is imperative during the COVID-19 pandemic, that staff be provided training on warning signs that may be an early indicator of mental health 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." Crown Point Central School will provide this training both in September and during one of our staff development days in March this year to attempt to assist in the above guidance.

Any furthers questions or comments, please reach out using the contact information found above.

Sincerely,

Shari L. Brannock
Superintendent of Schools

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 documented when training materials were not retained by the District.
- 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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www.osc.state.ny.us/local-government

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