

Eden 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

Audit Objective

Determine whether the Eden 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.

- Trainings offered did not provide any of the 12 recommended components of mental health that educators should know.

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 generally 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 Erie 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	412
Students	1,310
School Buildings	3

Audit Period

July 1, 2020 – June 30, 2021

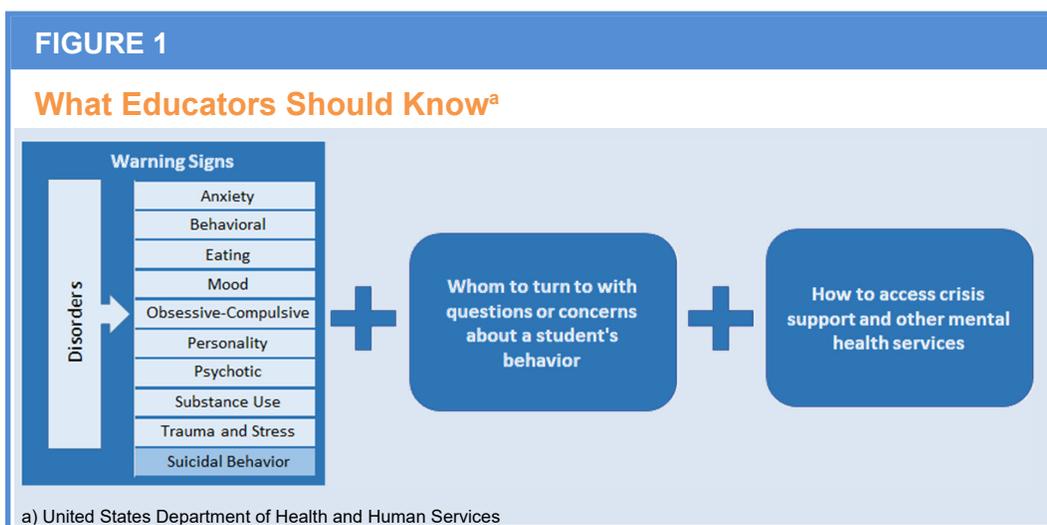
Mental Health Training

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 2, 2020, which must also include training on a component of mental health.

However, our review of the training records and materials presented by officials found the District did not provide training to any staff on a component of mental health as a requirement of the annual emergency response plan training.

The Superintendent told us two trainings that included mental health content were provided by the District through a third-party service provider: “Dignity for All Students Act” and “Discrimination and Harassment for Employees and Supervisors.” We reviewed the materials presented for these trainings and found that none of the 12 recommended mental health components were included (Figure 2). The training included content on harassment, bullying and discrimination, not the recommended mental health warning signs, “whom to turn to” and “how to access crisis support and other mental health services.”

Figure 2: District’s “Dignity for All Students Act” and “Discrimination and Harassment for Employees and Supervisors” Trainings

Mental Health Components	Included
Whom to Turn to	X
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	X
Trauma and Stress Related Disorders	X

The Superintendent told us he began employment with the District in July 2020 and the impact of COVID-19 shifted priorities with a greater emphasis and focus on reopening schools with five-day, in-person school weeks. The Superintendent also indicated that the District was not fully aware of the requirements and deadline for the mental health training. Furthermore, the Superintendent told us that the training provider did

not have any training specific to mental health, however; the District is currently working with its Board of Cooperative Educational Services to implement mental health training for staff.

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

Eden Central Schools

8289 North Main Street

Eden, New York 14057

Jeffrey A. Sortisio
Superintendent of Schools



Phone (716) 992-3629
Fax (716) 992-3656

February 1, 2022

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

Dear Chief Examiner Landcastle:

The Eden Central School District is in receipt of the preliminary draft findings of the recent examination of the District's Mental Health Training Audit. The Audit examined what mental health training was provided to the Eden CSD staff members prior to September 15th, 2020. The District thanks the State Comptroller's auditors for their professionalism while completing their work in the District.

As discussed with the auditors, and as is reflected in the preliminary findings, members of the Board of Education, administrative team, teachers, support staff, and community members were fully engaged in planning to return students to in-person learning during the days, weeks and months that proceeded the audit timeframe. The timeframe in question was one steeped in uncertainty, ever changing mandates and a host of unknowns to all involved, including our student body. Our singular focus at that time was to design robust return to school plans that emphasized the physical and mental health needs of our students while simultaneously planning viable curricular options. This was an unprecedented time in our world and certainly in the world of public education.

To complicate matters, the District was in the process of onboarding key members who have primary responsibilities in the areas of safety and training. As the auditors are aware and recognized in their report, this writer's first day of employment was July 1, 2020, a mere two days before Return to School edicts were presented to districts. Equally important is the District's Director of Facilities retired on June 30, 2020 and a replacement was not named until late August.

The report's key findings that the District did not provide mental health training to any staff for the 2020-2021 school year by September 15, 2020 as required by the New York State Education Department regulations is not entirely accurate. In fact forty-nine District teachers were trained in Mental Health First Aid prior to the date in question. Mental Health First Aid training is designed to meet all of the required elements in question, including warning signs and how to access assistance when helping a student. The District first embarked on offering Mental Health First Aid training to staff members in 2018. This training does require a re-training every three

See
Note 1
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Raiders Have: Respect and tolerance, Appreciation, Integrity, Determination, Empathy, Responsibility, Self-control

years and has thus been a mainstay in the district. To be fair, the information about the history of Mental Health First Aid training in the District, came to light after the auditor had concluded his research.

In addition, building level discussions about Return to School planning including information about recognizing students' needs academically as well as social/emotionally. Staff members were reminded that students may return with health insecurities or an increased level of anxiety. There were open discussions about how to help students adjust to returning to school during the pandemic. Additionally, and as shared with the auditors, the District has a strong student services team who regularly presents at faculty meetings on student mental health needs.

To be clear, the District did not provide mental health training to all staff members by September 15th, 2020. However, it would be erroneous for a reader of the auditor's report to assume that no mental health training was provided to staff members or that the District was not acutely aware of the mental health needs of its students as they returned to an in-person learning model.

Moving forward, the District looks forward to continuing the Mental Health First Aid training as well as developing an important yet less comprehensive required training program for all employees.

Please be advised that this letter does not represent the formal Corrective Action Plan for Eden CSD. The District will be submitting a corrective action plan to the Office of the Comptroller after receipt and review of the final published audit report.

Respectfully submitted,

Appendix B: OSC Comment on the District's Response

Note 1

As indicated in the response, officials became aware of the District's Mental Health First Aid training after the completion of our audit fieldwork. We reviewed this subsequent training information and found that the Mental Health First Aid training offered to the 49 teachers occurred in 2018, not during our audit period. In addition, the Superintendent told us an additional training session occurred in January 2022 for 38 staff members. Therefore, our audit finding that the District did not provide annual mental health training to any staff for the 2020-21 school year by September 15, 2020, as required by SED regulations, is accurate.

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 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 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 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

Contact

Office of the New York State Comptroller
Division of Local Government and School Accountability
110 State Street, 12th Floor, Albany, New York 12236

Tel: (518) 474-4037 • Fax: (518) 486-6479 • Email: localgov@osc.ny.gov

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

Local Government and School Accountability Help Line: (866) 321-8503

STATEWIDE AUDIT – Julie Landcastle, Chief Examiner

Utica State Office Building, Room 604 • 207 Genesee Street • Utica, New York 13501

Tel (315) 793-2484



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