CONTEMPLATING REGULATION OF COUNSELLORS IN CANADIAN SCHOOLS: CURRENT ISSUES AND CONCERNS

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According to current research, mental health issues are the leading health problem for Canadian children. Surveys also indicate that fewer than 25% of children are receiving care (Waddell, McEwan, Shepherd, Offord, & Hua, 2005); thus, schools play a key role in assessment, access to services, and possible referral to appropriate outside support systems. Currently in British Columbia schools, untrained individuals are hired into counselling positions due to the lack of qualified personnel. Our discussion focuses on this issue, the history and importance of certification and regulation of school counsellors, and our recommendations for actions that may assist in ensuring the welfare of children and families within the school system.

Introduction

The old adage--children are our future--has profound meaning in the context of current society, especially when healthy child development is at risk due to struggles with mental health problems. Waddell, McEwan, Shepherd, Offord, and Hua (2005) claim that mental health issues are the leading health problem for Canadian children. They present surveys that show 14% of children aged four to 17 years (over 800,000 in Canada) will, at any given time, suffer from mental health issues. These obstacles may include depression, anxiety, or behavioural challenges (e.g., aggression, inattentiveness, hyperactivity) and will undoubtedly cause problems both at

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home and school. These problems may also have an even greater impact, as children become adults (e.g., unemployment, criminal behaviour, substance abuse, suicide) creating long-term costs to the larger community. For counsellors² in schools, the state of children's mental health is especially pertinent due to the interference these problems may have on children's learning and future—essential issues that counsellors are intended to support.

The research also suggests that many Canadian youth experience mental health issues while concurrently having limited access to mental health support (Canadian Mental Health Association [CMHA], n.d.; Statistics Canada, 2002, 2005; Child and Youth Office for British Columbia, 2005). Surveys also indicate that fewer than 25% of children in need of care actually receive services (Waddell et al., 2005). In this regard, school personnel play a key role in facilitating access to some type of support services.

Educators have long recognized a need for counsellors within the school, even though the role of the counsellor has shifted over the years. Historically, counsellors in schools have moved from providing career services and academic advising (guidance), to remediation (e.g., crisis intervention, grief counselling) and prevention counselling (e.g., parent-teacher mediation, targeted education programs, referral to community services) (Sedlak, 1997). This is a significant shift in skill requirements and raises concerns related to standards of practice that require counsellors in schools to work with both guidance and counselling issues³. In such situations, we

² For the purposes of this paper, we define *counsellor* as an overarching term for mental health practitioners who provide services that are developmentally appropriate to facilitate self-knowledge, optimal development, and wellbeing for individuals, families, and/or groups who present with a wide variety of distressing issues that cause disruptions in daily functioning.

³ From about 1890 to the 1950s *vocational guidance* included educational or academic guidance only; *counselling* was conceived as a tool or technique to assist in the guidance program. In the late 1950s school "guidance and counselling" was first established as a profession because of the need for counsellors to deal with both career/academic and social/personal issues. For more detail see Bauman et al. (2003). In this paper, *school counselling* as a designation includes both guidance and counselling skills and competencies.

consider children's needs for protection from poorly delivered mental health services as significantly compelling. Access to trained counsellors is also important because of the evidence highlighting the need for and effectiveness of appropriate early intervention to specifically address the mental health needs of students (e.g., Jones, Daley, Hutchings, Bywater, & Eames, 2008; Kjobli & Sorlie, 2008).

With the increased need for children's access to mental health services combined with a lack of professional regulation and access to professional training, an important policy problem is created that we propose to address in this paper. Through an exploration of international approaches to counselling in schools, an examination of current standards of practice and regulation for counsellors in schools across Canada (using British Columbia (BC) as one specific contextualization), we propose important steps the field can take to begin to address this policy issue. Specifically, we propose that some form of regulation and certification may help to maintain standards of mental health care for Canadian school children while also protecting the counsellor facing an increase in diverse and complex mental health issues.

Background on Roles and Regulation

Context and Status

On a daily basis, educators are likely to encounter students (and families) affected by mental health issues. According to the Canadian Mental Health Association (CHMA, n.d.), as many as 20% of Canadian youth are affected by mental illness, with 5% of males and 12% of females experiencing a major depressive episode during their childhood. Over 3 million Canadian children 12 to 19 years old are at risk of developing depression, with 4,000 15- to 24-year-old Canadians committing suicide each year—the third highest rate in the industrialized

world. In fact, suicide is the second leading cause of death among 15- to 19-year- olds (Statistics Canada, 2008). According to the 2002 Canadian Community Health Survey (Statistics Canada, 2002), 18.3% of 15- to 24-year-old British Columbians had at least one diagnosed disorder or identified substance dependency. Despite these statistics, access to services remains a significant problem, as does continuity of care, lack of public funding, and early diagnosis (Eggertson, 2005). With this state of affairs, schools can be a critical and important access point for mental health services for children and their families. However, the focus of a wide-ranging debate in education and health policy circles is what access to mental health services needs to look like, who practices those services, and how the public interest can be protected.

School Counsellor Definition, Certification, and Regulation

School counsellors are specialists in child and youth development with knowledge that assists "all school personnel to respond better to the personal, social, career and educational needs of students" (Manitoba School Counsellors' Association [MSCA], 2002). Additionally, they provide an intervention, prevention, remedial, and developmental service that can include supporting students with their academic and career education, personal and social growth, as well as supporting other educators in working with students, developing healthy school environments, and participating in both staff and curriculum development (BCSCA, 2006).

The first certification for counsellor training was established in the mid-1950s in the U.S. (Bauman et al., 2003). Certification is defined as a recognition by an agency, government, or professional association that individuals have met minimal professional standards to practice independently as a counsellor (Canadian Counselling and Psychotherapy Association [CCPA], 2009; Gladding, 2001). Typically, certification has its roots in legislation. In BC's case, the

Health Professions Act establishes title protection in health-related professions⁴, while the Teaching Profession Act establishes the BC College of Teachers as the organization that certifies educators. Once certification is established in legislation, government or its specified proxy is responsible for establishing policies to regulate the profession and realize the government's goals. As argued in this paper, we see a compelling need for regulation through professional certification, and suggest that the stakeholder groups (in government, health, and education) work together to establish a legislative framework from which such regulation can be realized. This is because, in general, certification in counselling across North America is voluntary at the national level—and only mandatory for selected counsellor positions in particular states in the U.S. (Gladding) and particular provinces in Canada (Canadian Counselling Association, 2007). Specific to school counsellors, certification is even more complex.

Counselling and Teaching

The blending of roles in school counselling (i.e., professional educator and counsellor) can create complications when looking at issues of preparation and standards of practice.

Research into standards for school counsellors suggests that the mixing of these roles can be a barrier to creating effective practice (Baker, 1994). For example, based on a review of counselling research, Baker concluded that counsellors with teaching experience tended to approach counselling interactions from an instructional framework, while counsellors without such experience exhibited a more therapeutic approach. In other words, while a counsellor may work with a student to co-construct a therapeutic response to a mental health challenge, a teacher

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⁴ Title protection gives "exclusive rights to members of a profession to offer certain services [and] may protect consumers from low-quality service providers . . . professionals' use of titles may reserve a title for members of the profession who meet certain education, experience or training qualifications" (Competition Bureau, 2007, p. 25).

may be more likely to simply instruct the student in an appropriate response leaving the student vulnerable and failing to provide the student with needed therapeutic support.

Research also suggests that administrators, students, and other teachers find little to no difference in counsellor performance based on teaching background (Baker, 1994; Olson & Allen, 1993), suggesting that requiring teaching experience may add an unnecessary barrier to employment and bars otherwise qualified practitioners from the field. Other research, however, has found that teachers think that counsellors with teaching experience would be more effective because of the belief that school counsellors require an in-depth understanding of the contextual circumstances of a classroom in order to help children with school-related problems (Quarto, 1999). It is important to note, though, that this research concerns teacher beliefs about the importance of teaching experience and not actual evaluation of effective counselling practice. A similar survey mailed to counsellor educators in the U.S. found that most (75%) did not think that counsellors needed teaching experience, although 59% of the respondents felt that additional fieldwork in schools might be necessary (Smith, 2001). Interestingly, of the survey respondents with teaching experience, 72% felt that counsellors did not need teaching experience to be effective.

The Role of the Counsellor

Much of the recent research that looks at the role of counsellors in providing or helping students access mental health services shows that those roles have evolved as student needs and available resources change (MSCA, 2002). A potential contributor to the confusion surrounding counsellor roles and subsequently their effectiveness are the demands on the school counsellor to be a generalist who performs roles in leadership, advocacy, essential services, curriculum

development, and the like. These overlapping purposes have been exacerbated by the multiplicity of providers available to provide support services within schools. As with the counselling community in general, it is becoming more common to see multi-systemic interventions, and interdisciplinary team approaches to problems. In terms of roles in a multidisciplinary team, definition of roles in legislation or through certification would substantially clarify professional responsibilities and help ensure children receive only those services that providers have been approved and are competent to deliver.

Additionally, the institutional location of the school counsellor at the nexus of the classroom, community, and administration has led to the gradual expansion of responsibilities, as counsellors are now asked to provide career and academic guidance or assessment, mental health counselling, and even disciplinary oversight and school-based administrative support. This grabbag approach to the position clouds the professional knowledge requirements and capacities of practitioners. Whereas if standards were defined and regulated, the specific responsibilities and capacities of school counsellors could be narrowed and clarified, ultimately strengthening counsellors' institutional standing and effectiveness.

Counsellor Regulation in Canada and Beyond

Canada. Currently in Canada, only specific types of counsellors are regulated as a profession and only in the provinces of Ontario and Québec (i.e., guidance counsellors, psychoeducators, and marital and family therapists). In most other provinces, counselling practitioners may be registrants with existing professional associations (i.e., health, social services, or education); however, if the association does not register or certify its members it is

only through voluntary regulation that professions are monitored. With regard to school counselling specifically, regulation is even less defined.

In terms of voluntary regulation, in 2003 the Canadian Counselling and Psychotherapy Association (CCPA) established guidelines for accrediting counsellor education programs at the master's level through the Council on Accreditation of Counsellor Education Programs (CACEP). The Council was interested in both professional and "arms-length" evaluation of counsellor education programs and in cooperating with professional groups, provincial and federal institutions, and other agencies to promote higher standards in counsellor education. There is also a possibility for graduates of an accredited program to be fast-tracked into certification by CCPA as a means of voluntary regulation. However, at the present time there are only two programs (both from the same university) accredited by CACEP.

As evidenced in the table in Appendix A, few provinces have strong regulations in place for school counsellors; only six provinces have explicit policies allowing localities to make hiring decisions if there is a shortage of qualified candidates. Even in provinces where training at an approved program is required, the institution has significant latitude in establishing the coursework and standards through negotiation with professional organizations or accrediting bodies. The end result is that even in regulated provinces, counsellor preparation may vary considerably by institution.

United States of America. School counsellors in the U.S. must seek state certification—similar to the way in which a teacher would obtain such certification (Milsom & Akos, 2007).

Because such accountability is a state issue, inconsistencies arise in requirements for counsellor certification across the U.S. as a whole. Counsellor education course requirements can vary between states, similar to the variation in requirements for teaching experience, continuing

education, and standardized examinations of counselling competencies. Even so, the majority of states require a master's degree in guidance and counselling for school-based practice.

Additionally, national professional bodies and accrediting agencies are working to standardize professional practice. The American School Counsellor Association (ASCA) has proposed a national model to mitigate this inconsistency in certification standards and to support all aspects of counselling programs. Its concern focuses on a consistent identity within the profession, recognition of the responsibilities that school counsellors hold, and demonstration and communication of confidence to stakeholders. ASCA is currently surveying school counsellors and the public for comments on school counsellor competencies, which they intend to implement as part of their national model (American School Counsellors Association, 2007).

The Council for Accreditation of Counselling and Related Educational Programs (CACREP) has already set standards for school counselling preparation programs in the U.S. Milsom and Akos (2007) showed that graduates from CACREP programs scored significantly higher on the National Counsellor Examination (NCE) than did non-CACREP graduates, indicating greater knowledge competency; however, they worry that professionalism within the field is threatened due to inadequate coursework and development of school counselling practices in school counselling programs. In response, they suggest that national credentials may create a more highly valued professional competence, and a clearer counsellor (versus educator) identity. Additionally, a single certification would assist school counsellors in constructing a clear professional identity and standards of practice, as well as allow portability of licensure and the creation of a more flexible system of employment that would allow practitioners to move with demand. Similar efforts have been undertaken in teacher and administrator certification in

the U.S. through the Interstate New Teacher Assessment and Support Consortium (INTASC) and the Interstate School Leaders Licensure Consortium (ISLLC).

Other countries. In general, it appears that regulation of the counselling profession is a concern throughout the world. In Asia there currently appears to be no standard regulation or certification, although professional associations are exploring certification based on U.S. standards (Gong, 2003; Jiang & Xia, 2005). In Europe, the Department of Health (DH) funded the British Association for Counselling and Psychotherapy (BACP) and the United Kingdom Council for Psychotherapy (UKCP) to research the training provisions, standards, and practice of counselling and psychotherapy for all registering and accrediting counselling and psychotherapy organizations with the intent to create a model for national regulation (BACP, n.d.).

Regulation of School Counsellors in British Columbia

Protecting the Public Interest

It should come as no surprise that we suggest that Canada's schools and school counsellors join the broader movement toward regulation, in an effort to protect the public interest and strengthen the mental health of Canadian students. Across many of the Canadian provinces there are few mechanisms for ensuring the competent practice of counsellors broadly, and virtually none within the schools. As highlighted earlier, children face a wide variety of mental health needs and are among the most vulnerable populations as they are not able to access services on their own. While stories of underserved or mal-served individuals abound (e.g., lack of appropriate suicide assessment and intervention), systematic record keeping and data collection in this area is almost nonexistent. Even so, some evidence may be gathered from testimony offered by the Canadian Professional Counsellors Association (CPCA) to the BC

Health Professions Council when the British Columbia Association of Clinical Counsellors (BCACC) sought to have counselling included as a regulated profession within the *BC Health Profession Act* (Epstein, MacAulay, & Chisholm, 1997). The CPCA offered testimony noting that:

The risk of harm from incompetent, unethical, or impaired practice of counselling is potentially significant as in the instances of unreported child sexual abuse, failure to assess and prevent suicidal intent, sexual involvement with a client, and suggesting that a client was sexually abused as an infant thereby contributing to false memories and tragic lawsuits (sec IV, A. s.5[1][a]).

In the case of mental health services provided to minors in the schools, proper training for practitioners becomes critically important, as students are captive audiences with no legal standing to seek or refuse services. As such, their needs for protection may be even more compelling than those of adults.

The Case of British Columbia

The issues identified throughout this paper—poorly defined standards for preparation and practice, inadequate professional regulation, role confusion and mission creep, and limited data collection—are also evidence in the case of British Columbia.

Currently, counselling in British Columbia is an unregulated profession, despite a decade-long effort initiated by the BCACC to have counselling included in the *Health Professions Act* (see Appendix B for a list of regulated professions). Similarly, other than membership in the British Columbia College of Teachers (BCCT), school counsellors are not regulated, although the British Columbia Teachers Federation (BCTF) supports a Provincial Specialist Association (PSA) of teacher-counsellors, the British Columbia School Counsellors' Association (BCSCA). Interestingly, counselling is not raised in either of the province's

legislative governing documents, the *Teaching Professions Act* or the *School Act*. The only place we found mention of counselling was in the Ministry of Education's *Special Education Services: A Manual of Policies, Procedures and Guidelines* (2008), which states that school counsellors should have a professional teaching certificate and a master's degree recognized by the BCCT in counselling psychology or a related discipline with a focus on counselling (although practicumbased training was not specified). The result is a system of multiple standards from multiple organizations, with no defined governing authority (see the table in Appendix C).

As evidenced in the table in Appendix C (Models of Professional Standards for School Counsellor Practice in BC), the minimal recommended standards of the BCACC and those recommended in the Special Education Services: A Manual of Policies, Procedures and Guidelines (2008) are similar, and revolve around possession of a master's degree in counselling or a related discipline. More specifically, BCACC requires specific specialized counsellingbased coursework (e.g., diversity, group, family counselling/counselling ethics) and a specified number of direct or videotaped supervised practicum hours. This level of training makes a significant difference in the skill levels of the counselling practitioner. Thus, because there are no legislated qualifications for counsellors in general or school counsellors specifically, enforcement of these standards is voluntary. This is a particular concern around the master's degree in a related discipline where there may not have been any supervised counselling practicum. As with other provinces, there are no accrediting bodies, so even within counselling programs, there may be significant institutional variation in the content and conduct of the programs. Finally, the costs (fiscal and opportunity) of obtaining any certification rest with the individual, indirectly penalizing those seeking to work within accepted professional norms as they expand their education beyond regulated requirements.

School counsellors in BC can voluntarily join the BCSCA, which supports professional development for school counsellors and attempts to link members to one another. The members are first and foremost BCTF members and therefore members of the BCCT, and as such certified to teach. As a result, BCSCA members may be hired by districts and schools to serve both as teachers and counsellors (teacher-counsellors) even though they may not have specialized counsellor training. Voluntary membership in the BCSCA becomes the minimum standard, even though membership is based solely on self-identified interest and not training or professional preparation, ultimately creating a policy lever that minimizes hiring teachers-counsellors who meet the standards of the counselling profession (such as those for BCACC members).

Within the certificated professions, enforcement of standards can occur at one of three points: (a) at the successful completion of professional preparation programs; (b) at the point of hiring (with agencies only hiring trained professionals); or (c) by governing bodies after complaints are made. Under the current system in BC, enforcement of any counselling standards is relegated to hiring authorities only, responsible for enforcing their own self-imposed standards. The result is a general lack of accountability for the training and practice of counsellors specifically in schools. In this regard, some districts have implemented a new hiring policy where only master-level, practicum-based, trained counsellors will be hired. This is not consistent across districts, however, and shortages of trained counsellors are evident, leaving some schools with minimal counselling services and overworked counsellors, or non-qualified people being brought in to do the job. The result is a general lack of accountability for the training, employment, and practice of counsellors with regard to the general public and specifically in schools.

Protecting BC Students

Since BC school counsellors are not required to be a member of any counselling organization or association, the British Columbia College of Teachers (BCCT) stands as the only regulating body in which teacher-counsellors are members. As teachers, school counsellors are subject to disciplinary regulation under the BCCT, but not as counsellors. As such, their professional practice is primarily concerned with accountability to teaching standards, and not counselling practices. Investigation of public complaints or the initiation of disciplinary proceedings for unresolved complaints would be addressed by the BCCT, and even if the complaints were related to counselling malpractice, proceedings may not involve individuals with counselling expertise or training in ethical issues related to counselling (e.g., professional development in counselling ethics, required/monitored counselling supervision). None of the professional counsellor associations have legal authority or jurisdiction to investigate their discipline when it is practiced in schools. The only recourse professional organizations have stems from voluntary memberships that individuals might maintain; however, members would need only to resign their membership to avoid any complaints investigation.

This lack of oversight ultimately leaves BC children vulnerable to poor practice. As a result of this gap in accountability (and other professional concerns), professional counselling bodies in BC have been engaged in a decade-long effort to have counselling (including the counselling done in schools) become a regulated profession under the *BC Health Professions Act*.

Regulating Counselling in BC

This effort has not been successful to date however, largely because of the debate "over whether "counselling" was an activity performed by many health professionals or whether "counselling" could in itself be said to constitute a profession" (Epstein, MacAulay, & Chisholm, 1997, Section IV, Issue 1, ¶ 8). Even though the BC Health Professions Council (BCHPC) did not recommend counselling for designation under the *Health Professions Act*, members still felt that the field generally met the two requirements for regulation: (a) there is an identifiable body of professional counselling knowledge and standards of practice; and (b) there is a compelling need to protect the public interest through enforcement of standards.

Research supports this view of the BCHPC. Hermann, Leggett, and Remley specifically emphasized the critical need to protect the public interest (2008). They found significant differences with respect to legal issues in counselling practice when they compared licensed and not licensed participants. With regard to ethical standards of practice, licensed participants felt better prepared to respond to pressures to reveal confidential information or turn over confidential records. Licensed practitioners also felt better prepared to determine whether a client posed a danger to others or whether a client was suicidal. This ability to accurately determine the mental health needs of their constituents and protect their privacy rights has significant importance regarding protection of the public interest. Regulation of the profession through licensure may be an important way to define the professional knowledge needed by counsellors, ultimately strengthening their practice.

Professional Knowledge in BC

The Task Group for Counsellor Regulation (facilitated by BCACC) estimated that there are about 4,500 people who are not regulated by any professional governance statute in BC, yet are providing counselling services of various forms to the public. Occupations within BC under the counselling umbrella which have some type of certification, registration, or accreditation include art therapy, pastoral counselling, drug and alcohol counselling, employment or career counselling, marriage and family therapy, music therapy, clinical counselling, professional counselling, and general counselling. Although there are common competencies, each of these forms of counselling requires specific skills and knowledge. Currently, the Task Force is working towards occupational title protection and definition of specific competencies that encompasses the body of knowledge and skills that counsellors require for acceptable standards. For most of the occupations mentioned above the knowledge and skill levels obtained by a counsellors are at the master's level as an entry. However, as highlighted previously, even if these standards were to come into force, participation would be voluntary and not required of school counsellors. Additionally, the fact that school counselling is not defined as an occupation under the Task Group umbrella presents an additional barrier to improving practice in BC schools.

Even so, according to guidelines developed by the Task Group, irrespective of the umbrella under which they fall, education in a broad range of areas is necessary for all counsellors—including school counsellors—to practice competently (i.e., ethics, therapeutic alliance, theoretical foundations of human functioning, culture, diversity, and research practices). Ethical practice includes knowledge about the ethical boundaries around professional counselling practice, an understanding of legal requirements, ethical decision-making, record-keeping,

consultation practices, and self-care activities. Whether services are delivered to individuals or in a group setting, the therapeutic relationship calls for awareness of a multiplicity of counselling processes, including orienting clients to the counselling experience; knowing how to structure and facilitate the therapeutic process; maintaining core conditions for an effective counselling relationship (by using a selected theory that includes appropriate practice techniques engendering cultural competency and sensitivity to diversity issues); conducting thorough risk assessments; making appropriate referrals; ending the counselling relationship (when appropriate); and evaluating clinical practice. Counsellors should also have knowledge about collegial relationships in terms of professional communication, contributions, and collaboration. Finally, counsellors should be able to use available research to inform their practice by remaining current with the professional literature, and maintaining professional development within the community of counsellors and in their own informal inquiry.

As British Columbians work to strengthen mental health services in the community and improve the experience of students in the schools, such standards can form the nexus for creation of a system of professional practice and licensure that will protect both counsellors and the general public.

Recommendations and Conclusions

Counselling in schools in BC (and Canada) is at somewhat of a crossroads. Across the country, educators and counselling bodies have recognized the evolving role of the counsellor and the myriad services they have been asked to provide. As a result, regardless of emphasis, there is a distinct recognition that master's-level practicum-based training is needed. Within that recognition is an additional need to define specifically the role that counsellors should be

expected to play in the schools, and the counselling services they need to be prepared to provide. Education stakeholders are concerned about adequate provision and monitoring of mental health services in schools including hiring, preparation, and ongoing training of school counsellors. While there is, in our opinion, a compelling need to protect the public interest and mental health of children in our schools through some type of regulation system, what that system might look like is yet to be determined. Educators and school counsellors need to take the lead in this arena and address the issues around school counsellor roles and certification, and work closely with counselling associations (such as the BCACC and CCPA) to bring counselling under the auspices of the *BC Health Professions Act*.

In a *Canadian Journal of Counselling* article on counsellor certification, Handelsman and Uhlemann (1998) warned us to "be careful what you wish for," setting out four questions and related concerns regarding efforts to legislate the certification of counsellors. First, they ask if regulation is in the public interest. Looking at the educational, social, and mental health challenges children face today, and their limited access to services, we suggest that regulation is indeed in the public's interest. Their second and third questions are closely related, asking readers to consider the appropriate model of regulation (certification, registration, or licensure) and what the regulatory functions should be. Since BC teachers are already regulated and monitored in BC through the College of Teachers, specific teacher-counsellor regulations could be included within the current certification and professional disciplinary college. We recognize that this would be a shift in the mandate of the College, since graduate education is currently evaluated through the Teacher Qualification Service (TQS); however, as the demands of practice for professionals in schools begin to require preparation that extends beyond a typical undergraduate degree, this is an eventual issue that the province will have to wrestle. Finally,

Handelsman and Uhlemann ask about the costs for such regulation. Since much of the regulatory infrastructure exists, it is hoped that cost implications could be minimized, and mitigated through membership fees and the joint resources of professional counselling and education organizations. Our more specific answers to these important questions are offered in the following recommendations.

Recommendations

Throughout Canada, the role of school counsellors remains clouded and confused. School counsellors are asked to work as teachers, administrators, therapists, assessment specialists, and special education resources (among other roles). The role of counsellors in schools needs to be better defined so that preparation and certification requirements can be established and institutions can begin to meet their needs by employing qualified and appropriately trained practitioners. In the following section, we cover recommendations for changes in policy around school counsellor regulation on the basis of counsellor education, comprehensive guidance and counselling programs, and collaborations between organizations, and research on school counselling services.

Counsellor Education

As previously noted, BC school counsellors are allowed to practice counselling in schools through their certification as teachers by the BC College of Teachers (BCCT). As a protection to the public, this professional organization has a code of ethics to which members abide, and a disciplinary committee that deals with ethical and practice misconduct in the classroom. There are no specific regulations or standards for those teachers who have

counselling responsibilities under this code. This makes it possible for some teachers to perform counselling duties without appropriate counsellor training. To protect the mental health of BC's children, standards, regulations, competencies, and guidelines for the school counsellor should be developed by BCCT in consultation with professional counselling organizations (e.g., BCSCA and CCPA), and counsellor educators from recognized university programs. The standards should include, at a minimum, training in supervised practicum-based graduate-level counselling programs. As recognized by the PSA through its recommendation that practitioners hold a relevant master's degree, it is important for school counsellors to have such advanced training.

As other researchers (Epstein, MacAulay, & Chisholm, 1997) have recommended, we suggest the province of BC adopt a model for school counselling that requires graduate counsellor training, rather than allowing it to be optional (see table in Appendix C). That said, we recognize that this is not a simple task given the location of graduate study within the current regulatory and remuneration structures, and the tension between the BCCT as initial licensor and the TQS as the evaluator of BC public school teachers' professional and academic qualifications. As an interim step in this process, we suggest that all counsellors in schools be encouraged to register with, or hold membership in, a counselling association (e.g., BCACC, CCPA) that requires members to have graduate training and to abide by general ethical standards of practice. For similar reasons, students in professional graduate counsellor training programs should also be encouraged to join professional organizations that offer student memberships.

Comprehensive Guidance and Counselling Programs

In other provinces, such as Manitoba (MSCA, 2002) and Nova Scotia (Graham-Migel, 2002; Lehr & Sumarah, 2002), school counsellors are implementing comprehensive guidance and counselling programs within the school community. Gysbers and Henderson (2001) describe this type of program as a guarantee "that all students have access to school counselors and school counselors have access to all students" (p. 2). Gysbers (2002) suggests that programs include specific content (e.g., competencies for student academic success in the areas of career, educational, and personal-social development grouped by grade level), an organizational framework (e.g., definition, rationale, assumptions), program components (e.g., career curriculum, individual planning, responsive services, system support), and access to resources (i.e., human, financial, and political). For example, in Nova Scotia one comprehensive program included:

- 1. Guidance Curriculum: Structured experiences presented systematically through classroom group activities.
- 2. Professional Services: Counselling, consultation and coordination activities to meet the immediate needs and concerns of students.
- 3. Life/Career Planning: Activities which assist students to monitor and manage their own learning and make plans for life and career development.
- 4. Program Management and System Support: Activities which establish, manage, maintain and enhance the program. (Graham-Migel, p. 7)

The closest program to this type in BC schools is the Ministry of Education's kindergarten to grade 12 Career and Personal Planning (CAPP) program that aims to develop well-rounded students as individuals in relation to their academic progress, and their career, personal and social development. Establishing a comprehensive program also entails qualified counsellors to develop and maintain it. According to research by Lehr and Sumarah (2002), these

programs also stretch school counsellors' time with administrative duties that they may lack the time to adequately and effectively implement the program and meet the needs of the students at the same time.

Collaborations among Educational Organizations

The current counsellor supply pipeline may include structural barriers to practicing educators interested in taking on counsellor responsibilities. While we noted earlier that such a transition can be challenging (Baker, 1994), carefully tapping into the pipeline of educators may help alleviate the current shortage of qualified practitioners. Strengthened communication between school districts and counsellor education programs (such as in Manitoba) should be established in BC with the goal of reducing barriers to counsellor training for teachers who would like to move into this area of practice. In addition, to increase access to professional preparation, universities should work to establish cooperative programs that allow students to obtain appropriate training and preparation in professional counselling without having to give up employment.

The degree of harm to the public by persons practicing as counsellors without having been though a supervised practicum and counsellor training is not monitored well in the province or across Canada. Data gathering and reporting procedures in schools and in the broader health community should be strengthened to allow policymakers to examine the public impact of these practitioners.

Research on School Counselling Services

Child mental health outcomes should be measured in order to assess the full demand currently being placed on school counselling services in an effort to better address school district needs. Data collection in this area is particularly weak and should be strengthened through provincially and federally supported initiatives and institutional data collection programs and policies in order to understand the gaps in school counsellor training and school-based need.

School counsellors can do much more than simply provide therapeutic support and mental health services to students. In fact, it is difficult to envision providing mental health services to children without consideration of the broader context in which they live and learn. The role of counsellors in supporting the mental health of the school community broadly (through supporting the work of teachers, administrators, and community members) should also be considered within this discussion. While detailed discussion of this recommendation is beyond the current scope of this paper, the Coordinated/Comprehensive School Health Program (CSHP) Movement provides a sound research-based model for implementing this recommendation (Canadian Association for School Health, 2006; Centers for Disease Control and Prevention, 2005).

Much of our paper has focused on the largely self-regulating structure of the current system. It is also important for professional counselling associations to take a more active role in school counselling as part of their ethical mandate to protect the public interest. While their professional leadership in counselling is important, their specific engagement in school counselling is critical if this dialogue is to move forward. As such, we would urge BCACC and other professional counselling bodies see school counselling as part of their regulatory purview (see Recommendation 2, subsection 4, Epstein, MacAulay, & Chisholm, 1997).

Final Words

Finally, we recognize that these recommendations represent significant and systemic large-scale change. A move to such a system should not preclude immediate steps toward strengthening the mental health services available to children, and we suggest that school districts develop their own task forces and specific policies to research and regulate current practices in relation to school counsellors, including hiring practices, internal training recommendations and standards, plans for monitoring or supervising new and veteran counsellors, and professional counsellor development within the field. The failure of governmental systems to protect the public interest should not also result in a lack of responses from our educational institutions.

We believe that these recommendations are a first step in working towards child protection, implementing and accessing comprehensive school counsellor training, and opening dialogue about the needs within school counselling programs among parents, school personnel, professional associations, and counsellor educators. Currently, the amount of actual counselling service that qualified school counsellors are able to offer is systematically limited. By addressing these issues we can help to bring down these systematic barriers and ultimately strengthening the mental health of Canadians.

Appendix A:

General Provincial Requirements for School Counsellors

Prov./	Occupational emphasis ¹			Educational Licensing	Teacher	Counselling	Practicum	Voluntary	MA, MEd	Exemptions ²	Teaching
Terr.	Counselling	Guidance	None	Authority	License	training	training required	standards			Experience
AB	Yes ³	Yes		Ministry of Education	Yes						
ВС			Yes ³	College of Teachers	Yes	Yes ⁴	Yes ⁴	Yes ⁴	Yes ⁴		Yes ⁴
MB	Yes ⁵	Yes ⁶		Ministry of Advanced Education and Literacy	Yes ⁶	Yes ⁶	Yes ⁵		Yes ⁵	Yes	Yes ⁶
NB	Yes	Yes		Department of Education	Yes	Yes			Yes ⁷		Yes ⁸
NL		Yes		Department of Education	Yes				Yes ⁹	Yes	
NWT			Yes ³	Teacher Qualification Service							

NS		Yes		Ministry of Education	Yes			Yes ¹⁰	Yes ¹¹	Yes
NU	Yes			Department of		Yes ¹²			Yes	
				Education						
ON	Yes ³	Yes		College of Teachers	Yes					
PEI			Yes ³	Department of	Yes				Yes	
				Education						
QC				Yes ¹³				Yes		
SK				Ministry of Education	Yes	Yes ¹⁴			Yes	
YT			Yes ³	Department of	Yes					
				Education						

¹ In this table and throughout the paper, counselling is conceptualized as engaging in mental health services, while guidance is seen as providing college, career, and vocational advising. Most jurisdictions have separate regulations for school psychologists, not specified here (except in the case of Manitoba's Clinicians) as these positions tend to be district-wide and not school-based.

² Localities are allowed to make hiring decisions in the case of a shortage of qualified personnel.

³ While the province may recognize key differences in the role of counsellor and guidance, specific hiring decisions and qualifications for these roles are made at the local levels.

⁴ School counsellors in BC can voluntarily associate with the provincial specialist association. Members are encouraged, but not required, to have an appropriate graduate degree.

School clinicians have the primary responsibility for mental health counselling and related functions and include recognition as school psychologists (master's degree required). A provisional certificate is initially awarded for two years, leading to a permanent certificate based on two years of clinical experience; completion of the internship program at the University of Manitoba; and recommendation of a supervising clinician and school superintendent.

http://www.edu.gov.nf.ca/cert/Pdf/GuidanceCounsellorConditions.pdf

⁶ Counsellors are identified as guidance counsellors and required to have a valid teaching certificate, two years of teaching experience, 18 credits in defined courses and 12 hours elective coursework.

⁷ The Ministry certifies Guidance Counsellors and Guidance Teachers. Guidance Counsellors are required to have a master's degree while Guidance Teachers are not; however, both must take specified coursework and electives for certification.

⁸ Three years of teaching experience or the equivalent is required for both guidance counsellors and guidance teachers.

⁹ Guidance counsellors are recognized through an additional allowance for guidance work. See

¹⁰ A master's degree in guidance counselling is preferred but not required.

¹¹ In the case of a shortage of qualified personnel, localities can train internal staff for the position.

¹² To be employed as a school counsellor, individuals must complete an approved counsellor-training program and have a bachelor of education degree with a specialty in guidance. All schools must have a school community counsellor.

¹³ A master's degree in Orientation is required, as well as membership in L'corporation des counseillers et des counseilleres d'orientation du Quebec.

¹⁴ Completion of an approved integrated program is required and recognized through an Additional Qualification Certificate. Alternatively, a bachelors degree plus 48 hours of professional education training and a practicum is required for a Professional B certificate, which allows employment only in the specific field of preparation (e.g., counselling).

Appendix B: Health Professions List

The following 24 professions are regulated under the *Health Professions Act*:

- Chiropractic
- Dental Hygiene
- Dental Technology
- Dentistry
- Denturism
- Dietetics
- Emergency Medical Assisting
- Hearing Aid Dispensing
- Licensed Practical Nursing
- Massage Therapy
- Medicine
- Midwifery
- Naturopathic Medicine

- Occupational Therapy
- Opticianry
- Optometry
- Pharmacy
- Physical Therapy
- Podiatry
- Psychology
- Registered Nursing
- Registered Psychiatric Nursing
- Speech and Hearing Health Professionals
- Traditional Chinese Medicine and Acupuncture

Appendix C: Models of Professional Standards for School Counsellor Practice in BC

 Hold a relevant master's degree (counselling, clinical or educational psychology, pastoral counselling, marital and family counselling, clinical social work, psychiatric nursing, and applied behavioral sciences) from an institution acceptable to the Registration Committee. Show by transcript, or otherwise, a broad counselling base which includes: Normal development and abnormal psychology; counselling and personality theories; group therapy theory and practice; family therapy theory and practice; family threapy theory and practice; family threapy theory and practice; family threapy theory and practice; family threap theath professionals who are familiar with his/her work. At least one referee must have supervised the applicant's clinical work. Submit evidence of a minimum of 100 hours of direct clinical supervision. (by a qualified clinical supervision). Provide a criminal record search from his/her region, to be conducted at the applicant's expense. Possess or show intent to purchase professional liability insurance. Sign an agreement that he/she has read and understood the BC Association of Clinical 	in ated om an educational ed, showing e course Theory Counselling east 120 at contact e work in ving: ion and selling areer and Testing at Evaluation Methods at Human al eies es al

Counsellors' Scope of Practice, Code of Ethical Conduct, and Standards of Clinical Practice.			
(BCACC, 2007)	(BCSCA, 2006)	(BC Ministry of Education, 2006, p. 28)	(CCPA, 2007)

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