

Canandaigua City 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

Canandaigua City School District

Audit Objective

Determine whether the Canandaigua City 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.

- Twelve of the 91 employees' records we tested showed training was not completed by September 15, 2020, as required by New York State Education Department (SED) regulations.
- All 12 recommended components of mental health that educators should know were included in the District's training.

Key Recommendation

Provide mental health training to all staff and ensure it is completed by September 15, as required. Such training should address recognition of the warning signs, whom to turn to for assistance, and how to access appropriate services.

District officials agreed with our recommendation and indicated they will take corrective action.

Background

The District is located in Ontario 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 Assistant Superintendent for Personnel and Support Services was designated as the Chief Emergency Officer and was responsible for coordinating the emergency plan training for staff.

Quick Facts

2020-2021 School Year

Staff	906
Students	3,314
Staff Training Records Tested	91
School Buildings	4

Audit Period

July 1, 2020 – June 30, 2021

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

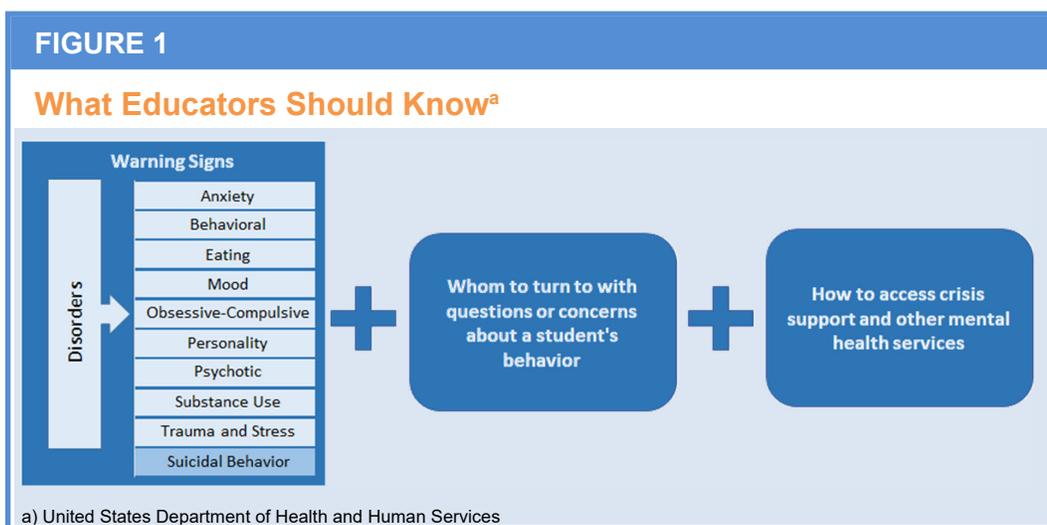
Mental Health Training

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 Included All Recommended Mental Health Components

The Superintendent certified to SED that by September 8, all staff received the training on the emergency response plan, which must also include training on a component of mental health.

We reviewed the District’s “Student Mental Health: Awareness, Intervention and Referral” training module and found all 12 recommended mental health components were included (Figure 2).

The District Did Not Provide Training to All Staff by September 15

Officials told us they provided the District’s “Student Mental Health: Awareness, Intervention and Referral” training to all staff. We tested District records for 91 of the 906 staff to determine if the “Student Mental Health: Awareness, Intervention and Referral” training that included mental health components was completed by September 15, 2020, as required. We found 79 of 91 employees’ records examined showed training was completed by September 15. Records for 12 of the 91 employees’, which included a School Counselor, Director of Facilities, Teaching Assistant, Classroom Aide, Substitute Teacher, Substitute Registered Nurse, Audio Visual Assistants (2), Substitute Audio Visual Assistant, School Bus Drivers (2) and a Bus Monitor showed the training was not completed by September 15.

The Chief Emergency Officer told us he monitored completion by notifying all staff, via e-mail on June 16 and July 9, of the District’s training completion deadline of September 9. An additional reminder to complete required training

Figure 2: District’s “Student Mental Health: Awareness, Intervention and Referral” Training

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

was sent to all staff on September 11. The Chief Emergency Officer also told us he sent e-mail notifications beginning September 16 to the supervisors of those employees who had not completed training by September 15 for follow up. The Chief Emergency Officer told us he believes the reminders to staff is the reason for the high rate of completion.

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.

Appendix A: Response From District Officials



Jamie Farr, Superintendent of Schools
Matthew Fitch, Assistant Superintendent for Business
Brian Nolan, Assistant Superintendent for Personnel
Matt Schrage, Assistant Superintendent for Instruction

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Unit Name: Canandaigua City School District
Audit Report Title: Mental Health Training Audit
Audit Report Number: S9-21-25

The purpose of this document is to serve as both the Canandaigua City School District's Corrective Action Plan and Audit Response Letter.

The Canandaigua City School District was pleased to see that the audit of our mental health training found that the training provided by the district does include all of the twelve recommended mental health components. The training provided by the district is through an online platform that records employee completion. The employees of the Canandaigua City School District are provided paid time to complete the training. Employees were directed to complete the training by September 9th. Employees who did not complete the training by September 9th were notified on September 11th that they were to complete the training immediately. On September 16th the district notified the supervisors of the employees who still had not completed the training, and directed the supervisors to have the employees complete the training. The district agrees with the audit findings, as with the state deadline of September 15th, there were some employees who did not meet the state deadline.

Audit Recommendation: The District Officials must provide mental health training to all staff and ensure it is completed by September 15, as required.

Implementation Plan of Action(s): In July, all employees will be notified of their responsibility to complete the mental health training with a deadline of approximately one week prior to September 15th. The day after the deadline, all employees who have not completed the training will be notified via email that they need to complete the training by the following day. By or before September 14th, all supervisors will be notified that they need to pull their employees who have not completed the mental health training and have them complete the training prior to returning to work.

Implementation Date: Prior to September 15, 2022

Person Responsible for Implementation: Assistant Superintendent for Personnel and Support Services

Signed:

January 20, 2022
Date:

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 interviewed District officials to gain an understanding of the District's computer systems used for creating, disseminating and monitoring mental health training provided to 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 recommended United States Department of Health and Human Services guidance. We extended the scope forward to October 6, 2021 to include the date the auditor observed training material – "Student Mental Health: Awareness, Intervention and Referral" module (2021-22 presentation).
- We determined the total number of individuals employed by the District during our audit period by obtaining and reviewing an employee listing.
- Using the District's employee listing we grouped all employees by job type, specific (Superintendent, Principal, Assistant Principal and Counselors), teachers and other staff. We used a bias selection method and random number generator to select a sample of 91 employees (10 percent), consisting of 25 specific, 33 teachers and 33 staff, to determine whether employees completed required trainings according to job titles. Employees hired on or after July 1, 2020 and employees who left the district prior to September 15, 2020 were not included in the sample.

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.

Unless otherwise indicated in this letter, samples for testing were selected based on professional judgment, as it was not the intent to project the results onto the entire population. Where applicable, information is presented concerning the value and/or the relevant population size and the sample selected for examination.

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

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