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# Examining Variation in Compliance to a New School Counselor Policy by School and School Counseling Program Variables

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## Abstract

To address a gap in the research, we conducted a policy evaluation to investigate if a recent state policy change had met its intended goals to decrease school counselor ratios and increase their time with students. Participants included 143 PK-12 public school counselors in one state in the southeastern region of the United States. Results of this statewide study revealed: (a) a decline in ratios pursuant to policy adoption; (b) less non-counseling duties when following the policy; and (c) elementary level school counselors were more likely to meet policy guidelines as compared to secondary school counselors. School counselors who reported that they were not able to implement the policy attributed this to a lack of support. This exploratory study indicates that statewide policy can impact.

*Keywords:* policy, school counselor ratios, advocacy, non-counseling duties

In recent years, under pressure to address the needs of the whole child, improve postsecondary outcomes, and address the nation's mental health crisis, several states have adopted policies that mandate reduced school counselor ratios and, in some instances, more direct time with students (Gagnon & Mattingly, 2016). While the focus of state policy is to reduce school counselor caseloads and non-counseling duties, educational policy researchers have demonstrated that favorable policy alone seldom resolves complex professional issues (Heck, 2004). Of note, local-level policies ensuing from policy change often manifest in narrowly conceived programs and practices informed by available resources and priorities and markedly differ from the policymakers' original conceptualization (Rallis & Cary, 2017). Policy evaluations are conducted to determine the fidelity of policy implementation, with the intent to identify gaps, uncover inequities, and inform ongoing advocacy (Heck, 2004). To date, scholars in the field of school counseling have yet to conduct a formal policy analysis in the states that have enacted ratio realignment.

In the 2018 school year, the Tennessee Board of Education introduced Policy 5.103 (2017) to reduce counselor-to-student ratios and mandate that school

counselors spend 80% of their time providing direct and student support services. Funds to support the hiring of additional school counselors is determined by Tennessee's Basic Educational Program (BEP), which is outlined by the Tennessee Department of Education (TN DOE) as "a funding formula [not budget]. Each school system has the flexibility in determining the most appropriate use of state funds to best meet the needs of the local system" (Tennessee Comptroller of the Treasury, n.d. p.4), and consequently funding for school counselors is left to the discretion of district officers who can elect to hire additional administrators instead of school counselors, based on their perception of their local school needs. Thus, the purpose of this research is to examine if Policy 5.103 met the policymakers' goals to reduce school counselor ratios and increase their time in direct service to students, with the aim that results can be used to steer ongoing professional advocacy and action.

## Literature Review

### Impact of Federal Policy on School Counseling

The term *policy* is a broad construct that encompasses "rules, regulations, laws, ordinances, court decisions, [and] administrative decisions, generated from both the public and private sector" (Fowler, 2013, p. 5), all of which is intended to promote civic well-being, and not the interests of the policymakers (Rallis & Carey, 2017). Policy studies have shed light on the evolution of educational policy over the past century in response to socioeconomic forces, human rights issues, and human capital demands (Irby et al., 2018). The field of school counseling exemplifies how a profession can be shaped by influential educational policies developed to address the ever-changing demands of school and society (Studer, 2015). Although vocational counselors were a presence in many U.S. high schools since the era of vocational guidance, it was not until the passage of the National Defense Education Act (NDEA) of 1958 that definitively established the contemporary profession of school counseling (Gysbers & Henderson, 2012). The NDEA, passed in response to the existential threat posed by the Russian domination of the space race, provided substantial funding for the hiring and training of school

counselors, with the intent that school counselors would identify the best and brightest students and guide them to a career in the sciences (Gysbers & Henderson, 2012).

It would be reasonable to conjecture, based on NDEA's agenda for school counselors' role, that vocational activities would dominate their work. However, since the days of NDEA, school counselors have adapted their roles to fit local context and pressing student needs, and career and postsecondary counseling is only one aspect of school counselors' work along with supporting students' developmental, mental health, and academic concerns (Carey & Martin, 2017). Moreover, education in the United States is primarily a local operation, with both the federal and state governments deferring to state departments of education, which in turn defer to local education agencies (LEAs; Rallis & Carey, 2017). Because local decision-makers exercise control over how school counselors are deployed, the demands of local constituents and available resources exert the greatest influence over the day-to-day nature of school counselors' work, and overshadow social concerns embodied in policy, such as the need to direct bright students into the sciences (Rallis & Carey, 2017).

### School Systems and School Counselor Roles

Discussions of the gap between policy conceptualization and implementation have also shed light on the unintended effects of policy not related to its intended goals (Fowler, 2013; Heck, 2004). Most major pieces of federal legislation from the current or previous century did not mention school counselors, an omission that, according to researchers, has made them vulnerable to unforeseen policy repercussions (Rallis & Carey, 2017). For instance, underfunded provisions of the Individuals with Disabilities Education Act (IDEA, 2004) and Section 504 of the Rehabilitation Act (1973) have resulted in school counselors being designated to time-consuming coordination roles on Response to Intervention (RtI) and 504 teams (Brown et al., 2019). The No Child Left Behind Act's (NCLB, 2001) unilateral emphasis on a school's annual yearly performance, particularly in reading and math, resulted in the devaluation of school stakeholders not directly responsible for delivering the core curriculum (Bemak et al., 2014). In the years following the passage of NCLB, school counselors have been challenged to obtain direct time with their students (Dollarhide & Lemberger, 2006). In turn, school counselors' contribution to school accountability has often been defined on their behalf by administrators, who have, since 2001, consistently relegated them to the role of campus test coordinator (Brown et al., 2019).

Undoubtedly in the absence of federal policy, the profession of school counseling would not have emerged (Gysbers & Henderson, 2012), yet considerable confusion and misunderstanding encircle their work (Savitz-Romer, 2019). Aside from the nuances of local policy context, differences in school counselor practices have been examined in terms of school variables, with research findings indicating that school counselors in economically disadvantaged (Dimmit & Wilkerson, 2012), rural, and

secondary school (Chandler et al., 2018) settings provide fewer comprehensive school counseling services. Additionally, school counselors' position within the school hierarchy can make them susceptible to role diffusion (Perusse et al., 2004). Since the days of vocational guidance, school counselors have been hired, supervised, and evaluated by their campus principals (Gysbers & Henderson, 2012). In general, principals have no formal training in school counseling or knowledge of appropriate roles yet exert considerable influence on how school counselors spend their time (Studer, 2015). While some studies have found that principals value their school counselors and identify school counselor roles consistent with national standards (Zalaquett & Chatters, 2012), other research revealed that most principals continue to believe clerical tasks, including registration and scheduling, maintaining student records, and test administration are central to the purview of school counselors (Perusse et al., 2004).

### The Emergence of the ASCA National Model

To offset these pressures and advance the profession, the American School Counselor Association (ASCA) has served as a policy advocate to define school counselors' roles and establish the linkage between appropriate use of school counselors' time and students' achievement (Savitz-Romer, 2019). In 1997, ASCA published the national content standards for students, which outlined developmentally informed student competencies across the domains of career, academics, and personal-social (Campbell & Dahir, 1997). The identification of core school counselor standards was followed by the publication of the ASCA National Model (2003) that provided a blueprint for implementing data-driven, comprehensive school counseling programs (CSCP). The ASCA National Model (2019), currently in its 4th edition, recommends that school counselors spend 80% of their time in direct and indirect service to students, and student ratios do not exceed 250:1. Direct services consist of the core curriculum to address developmental standards and ASCA mindsets, individual student planning, and responsive services, including individual and small group counseling interventions and crisis support. Indirect services consist of referrals and consulting and collaborating with other stakeholders to support student success (ASCA, 2019). Direct and indirect services contrast to those non-guidance activities frequently assigned to the school counselor but not suitable for their role. These have been noted to include substitute teaching, test administration and coordination, processing discipline referrals, and registering students (Gysbers & Henderson, 2012).

The merit for school counselors' engagement in direct and indirect service is evidenced by several studies that have demonstrated a relationship between the provision of school counselor services and improved student outcomes, across a variety of academic and behavioral indicators, particularly for underrepresented student populations (Cholewa et al., 2015; Davis et al., 2013). As a caveat to positive results, the size of school counselor caseloads is a significant predictor

of more favorable student outcomes, with research findings indicating that students in schools with lower school counselor ratios experience higher graduation rates, fewer disciplinary infractions, increased academic achievement, and improved interpersonal functioning (Carey & Dimmitt, 2012; Goodman-Scott et al., 2018; Lapan et al., 2012; Parzych et al., 2019).

### State by State Variation in School Counselor Ratios

ASCA's efforts to promote appropriate roles and ratios have, over time, positively influenced the policy process at the state level, with over 45 states adopting a comprehensive, developmental, school counseling program model and standards aligned to the ASCA Model. Nonetheless, high ratios continue to impact school counselors' work and, according to researchers, can impact their ability to implement state and national models (Studer, 2015). The National Association of College Admission Counselors (NACAC, 2019) reported the national average school counselor-to-student ratio in the 2014-15 school year was 482:1, with only three states (New Hampshire, Vermont, and Wyoming) maintaining ratios under 250:1. Similar results were found by the Carsey Foundation (Gagnon & Mattingly, 2016), who reported on median ratios due to significant within-state variation in counselor caseloads. Results from their nationwide study indicated only 17.8% of school districts met the ASCA recommendation of 250:1, and states such as Arizona and California experienced ratios over 1000:1. As noted in the report, students in the greatest need of school counseling services were found to have the least access, with low-income minority-serving schools disproportionality impacted by high ratios compared to affluent, majority serving schools (Gagnon & Mattingly, 2016).

### Recent State Policies to Reduce School Counselor Ratios

The problem of school counselor-to-student ratios has recently emerged on the agenda of policymakers, with several states enacting legislation and policy that increases student access to the school counselor by addressing ratios and mandating school counselors dedicate the majority of their time to student services (Gagnon & Mattingly, 2016). The backdrop to these measures is a rise in school shootings and adolescent suicide rates, which has raised concern over students' mental health and prompted policymakers to examine students' access to school-based mental health services (Hanna, 2019; Mann et al., 2019). Additionally, the Every Student Succeeds Act (ESSA, 2015) replaced NCLB. The ESSA maintained the rigorous accountability measures outlined in NCLB yet expanded indicators of success to include factors such as college readiness and school climate (Brown et al., 2019). Similar to NCLB, the ESSA does not ostensibly mention school counselors. Nonetheless, the ESSA's recognition of the impact of school climate on student learning and the identification of postsecondary outcomes as a salient benchmark of student success (Brown

et al., 2019) has stimulated conversations about the underutilization of school counselors in these critical areas (Savitz-Romer, 2019).

Educational stakeholders face an increasingly complex set of demands that have, arguably (Savitz-Romer, 2019), opened up a policy window for school counselors to advocate for increased access to students and a decrease of unmanageable caseloads. While it is not possible in this paper to delineate the entirety of state legislative activity relevant to school counselor role and ratio, we believe it's helpful to draw attention to a few notable changes in state laws. In 2013, North Carolina passed General Statute 115C-316.1 to require that 80% of school counselors' time be spent providing a comprehensive school counseling program. In 2017, the Tennessee Board of Education implemented Policy 5.103-School Counseling Model and Standards. Following Tennessee, in 2019, Arkansas passed the School Counselor Improvement Act, and Virginia passed HB 1729. Central to these policies was a reduction in K-12 school counselor-to-student ratios and the requirement that all public-school counselors spend most of their time helping meet students' academic, social, or emotional needs/concerns. The Arkansas Bill included the caveat that school counselors spend no more than 10% of their time on administrative tasks. In California and Arizona, policymakers have begun to furnish districts with the resources to reduce untenable counselor ratios, and in Maine, Oregon, and Pennsylvania, proposed bills aim to decrease counselor ratios and increase their time with students. Finally, in Florida, in the aftermath of the Parkland shooting, Senate Bill 7030 (2019) prioritized mental health in schools and recommended the caseload for school counselors better align with ASCA recommended ratios. Further, the Florida Department of Education now requires all schools to provide at least five hours of mental health education each year to all students.

### Purpose of this Research Study

Despite the potential of state policies to relieve ongoing issues related to school counselor ratios and assignment of non-counseling duties, educational policy adjusts to fit the context in which it is implemented (Carey & Martin, 2017; Rallis & Carey, 2017). To date, there is a shortage in the research that has evaluated the impact of specific state policies upon school counselor ratios and duties. In the absence of this knowledge, stakeholders may overlook an opportunity to uncover implementation challenges and solutions during a time when policy windows are more favorable to refocusing resources on the school counseling profession. This policy analysis was conducted to evaluate the impact of Tennessee State Board Policy 5.103 on school counselor ratios and time division. In contrast to data gathered from formal research studies, which is primarily generated for intellectual purposes, policy analysis research findings are intended to be looped back into policy debate and action (Heck, 2004). Thus, we intend the results of this research to provide convincing data to inform advocacy,

steer discourse, and alert policymakers of implementation challenges.

### The Case of Tennessee

Policy 5.103 recommends school counselor ratios of 500:1 for elementary grades (K-6) and 350:1 for secondary grades (7-12) and requires counselors to spend at least 80% of their time providing direct and student support services, categories aligned to the ASCA's direct and indirect services, respectively. While the average ratio for Tennessee, reported by NACAC (2019) for the 2015 school year was 339:1, which falls within this target range, analysis of the 10-year trend in school counselor ratios demonstrates no significant ratio declines have occurred since the 2007-2008 school year. Further, the 339:1 ratio conceals considerable within state variation as, prior to Policy 5.103, many school counselors in high need urban areas faced ratios above 900:1. Nonetheless, the extent to which LEAs follow the specifications of Policy 5.103 may be contingent on local budgetary priorities, as per the BEP, school leaders can request to use funds for additional administrators instead of using funds to meet the rules of Policy 5.103. To examine the policy impact, we posited four research questions:

1. Did the school counselor ratios change from the pre-policy year (2017-18 school year) to the post-policy year (2019-20 school year)?
2. What percentage of school counselors provided 80% of direct and student support services in the 2019-20 school year? Was the provision of services influenced by school district variables, school counselor ratios, and non-counseling duties?
3. What specific non-counseling duties, if any, affect school counselors' ability to meet the 80% guideline?
4. What changes occurred due to the policy, and if there were no changes, what reason do school counselors attribute to the lack of change?

### Method

#### Study Design

Policy analysis studies draw from qualitative and quantitative traditions permitting a flexible research approach (Heck, 2004). Within this tradition, policy evaluations specifically examine how policies are integrated into practice and the extent to which they achieved their intended goals (Heck, 2004). We conducted a policy evaluation using survey methodology to poll school counselors from across the state of Tennessee regarding their perceived impact of an educational policy change upon their ratios and time dedicated to direct and student support services. Given the time delay between policy adoption and implementation, we followed educational policy researchers' recommendations to wait a full academic year before conducting the evaluation (Fowler, 2013; Heck, 2004). The shortage in policy research, within the field of school counseling, in addition to the absence of a standardized survey instrument tool based upon the

Tennessee school counselor model, influenced our decision to use an exploratory study design. Exploratory studies are often deployed in social and behavioral sciences to examine relationships between variables when there is limited prior research to warrant the examination of a directional hypothesis (Swedberg, 2020).

### Measures

To answer the four research questions, we developed a 50-item survey. To discern change related to policy adoption, we created multiple-choice (dropdown and checkboxes) and some open-ended questions to measure: (a) change in ratios over three years from pre- to post-policy adoption; (b) school counselor adherence to the 80% recommendation (with the options of yes, no, or unsure); (c) notable changes related to policy adoption; (d) if no changes were noted, factors that may have prevented policy adherence. Similarly, multiple-choice and open-ended items were developed to gather information about school counselor demographics (e.g., age, gender, race, education, years of service, and current grades served) and school demographic data (e.g., school size, location, student race/ethnicity, and Title I status), non-counseling, and fair share duties.

In developing the data collection instrument, we endeavored to follow best practices in survey design (Kalkbrenner, 2021). First, demographic questions were informed by categories aligned to the U.S. Census, Tennessee Department of Education, and inclusive approaches to demographic data collection (Fernandez et al., 2016). Second, to mitigate the occurrence of type two error, the extant literature related to school characteristics, school counselor ratios, and non-counseling duties (Chandler et al., 2018; Dahir et al., 2009; Fan et al., 2019) provided the theoretical underpinning for examining variables that may have affected policy adoption. Third, to refine items and troubleshoot unexpected problems, we conducted a pilot survey in fall 2019 at the state's counselor association conference. The survey pilot produced a completion rate of 73.2% (n = 30). The response rate could not be established as we could not determine the total number of school counselors in attendance at the conference. Through item analysis of the pilot results, we noticed missing or ambiguous data on several items. In the original survey, the items querying school counselors about their non-counseling related duties and why their district did not follow the policy recommendation were open-ended. To increase response rates, we used categories provided by participants to create a multiple-selection dropdown item, which allowed respondents to select the non-counseling duties and support personnel they encounter in their work.

### Sampling Procedures

Following the pilot study, we recruited participants for this IRB-exempt study through an anonymous Qualtrics link utilizing multiple platforms: The state school counseling association's listserv, social media, respondent referrals, and dissemination via school counseling supervisors.

Participants were eligible to complete the survey if they were currently employed in a K-12 public school in the state of Tennessee. The second survey had 146 responses, with 116 complete and 30 incomplete responses for a completion rate of 79.5%. Again, the response rate could not be determined due to the sampling procedure.

**Sample**

We combined the valid responses from the first survey with the second survey into IBM’s Statistical Package for the Social Sciences (SPSS Version 26). During this process we removed several participants from analysis, predominately for reasons associated with missing data. One participant noted that the school was an alternative school and did not include the number of students, as enrollment was revolving. Rather than use a missing value function, we did not include this participant in the analysis regarding school enrollment. The final sample consisted of 143, racially diverse, predominately female respondents (see Table 1). All participants stated that they have earned a graduate degree, with the majority in school counseling ( $n = 116, 81.1\%$ ). Other graduate degrees were: (a) dual program in school counseling and clinical mental health counseling ( $n = 20, 14.0\%$ ); (b) clinical mental health counseling ( $n = 4, 2.8\%$ ); (c) curriculum and instruction ( $n = 1, 0.7\%$ ); (d) social work ( $n = 1, 0.7\%$ ).

**Table 1**  
**Sample Characteristics**

Characteristic	<i>n</i>	%
Age		
18-24 years	1	.7
25-44 years	82	57.3
45-64 years	58	40.6
65 years plus	2	1.4
Race/Ethnicity		
Black/African American	61	42.7
Latino/Hispanic	1	.7
White/Caucasian	75	52.4
Native Hawaiian/Other Pacific Islander	1	.7
Other	5	3.5
Gender		
Female	133	93.0
Male	10	7.0

Note.  $N = 143$

**Research Analyses**

We completed a post hoc power analysis using the G\*Power 3.1.9.7 statistical software program to determine if our sample size had sufficient power at the .80 level with  $\alpha = .05$ . The results of the analysis indicated that a minimum sample size of 108 was required for our primary analyses, the contingency tables. Given our sample size of 143, this analysis indicates our study has sufficient power to allow for statistical inferences related to the change post policy implementation (Faul et al., 2007). Due to the majority of the data being nominal or ordinal and the non-normal

distribution, we analyzed the data using descriptive and non-parametric statistics with  $\alpha$  at .05. Wilcoxon Signed-ranks test, used for comparing the median ranks of two related samples, was utilized to determine the difference between school counselor ratios for the two years under examination (Hinkle et al., 2003). Point-biserial correlation analysis was used in comparing the relationship between one dichotomous variable and one continuous variable (Hinkle et al., 2003). Fisher’s exact test, used for two dichotomous variables with random samples and independent observation, was selected instead of Chi-square due to the small sample size (Frey, 2018). We also examined effect size measures to determine practical importance using the following levels recommended by Rea and Parker (1992) for examining nominal data, precedence for which has been established by complementary studies in educational research (see Erickson & Quick, 2017; Kotrlik et al., 2011): negligible ( $0 < .1$ ), weak ( $.1 < .2$ ), moderate ( $.2 < .4$ ), relatively strong ( $.4 < .6$ ), strong ( $.6 < .8$ ), and very strong ( $.8 < 1.0$ ). In the results, phi ( $\phi$ ) signifies the effect size for Fisher’s exact test.

**Results**

**Research Question 1**

Research question 1 examined the change in school counselor ratios prior to and post-policy implementation. School counselors reported their school counselor ratios through incremental levels: level 1 ( $\leq 250:1$ ), level 2 (251-300:1), level 3 (301-350:1), level 4 (351-400:1), level 5 (401-450:1), level 6 (451-500:1), level 7 (501-550:1), level 8 (551-600:1), level 9 (601-650:1), level 10 (651-700:1), level 11 (701-750:1), and level 12 ( $\geq 751:1$ ). School counselors who reported “Other” or “Unknown” ( $n = 17$ ) as their school counselor ratios were excluded from this step in the data analysis process ( $N = 126$ ). Using these levels as the dependent variable, a Wilcoxon Signed-ranks test indicated that post-policy ratio median ( $Mdn = 4; M = 4.87, SD = 3.42$ ) was statistically lower than pre-policy ratio median ( $Mdn = 6; M = 6.28, SD = 3.71$ )  $Z = -5.354, p < .001$  with a relatively strong negative association ( $\phi = -.448$ ). The median range of school counselor-to-student ratios decreased from 451-500 for the 2017-18 school year to 351-400 for the 2019-2020 school year.

**Research Question 2**

Research question 2 addressed the percentage of school counselors who provided 80% of direct and student support services in the 2019-20 school year and if services were influenced by school district variables, school counselor caseload, and non-counseling duties. The 11 school counselors who reported that they were unsure if they provided 80% direct and student support services were removed from this analysis ( $N = 132$ ). Descriptive analysis indicates that 77% ( $n = 102$ ) of the sample met the new 80% guideline, whereas 23% ( $n = 30$ ) did not meet the guideline. To address the second part of the research question, we

examined the relationship between time spent in direct and student support services and: (a) school counselor ratios for the 2019-2020 school year (excluding unknown/other); (b) the percentage of time allocation for non-counseling duties; (c) the number of students enrolled; (d) student race/ethnicity; (e) school grade level (elementary or secondary); (f) percentage of economically disadvantaged students according to Title I status; (g) school location (urban, suburban, or rural). Point-biserial correlation

For the third research question, we used Fisher’s exact test to examine the relationship between 80% direct and student support services delivery and school counselors’ report of the following non-counseling duties: (a) standardized testing coordinator, (b) Section 504 coordinator, (c) RtI coordinator, (d) new student enrollment, (e) attendance monitoring, (f) discipline referral entry, (g) substitute teaching, (h) other duties/tasks. A significant relationship, with moderate negative association, was found between

**Table 2**  
**School Counselors’ Non-Counseling Duties for 2019-2020**

Non-counseling Duties	80% Direct Service Delivery				$\phi$	$p$
	Definitely No/Probably No ( $n = 30$ )		Definitely Yes/Probably Yes ( $n = 102$ )			
	$n$	%	$n$	%		
Standardized Test Coordinator	8	26.7	7	6.9	-.262	.006
Section 504 Coordinator	20	66.7	52	51.0	-.132	.095
RtI Coordinator	5	16.7	13	12.7	-.087	.236
New Student Enrollment	6	20.0	9	8.8	-.223	.016
Attendance Monitoring	15	50.0	44	43.1	-.050	.358
Discipline Referral Entry	8	26.7	10	9.8	-.223	.016
Substitute Teaching	6	20.0	8	7.8	-.165	.065
Other Duties/Tasks	14	46.7	24	23.5	-.207	.018

Note.  $N=132$

analysis was utilized to examine the relationship between the time school counselors spend in direct and student support services with the percentage of time allocation for non-counseling duties, the number of students enrolled, and student race/ethnicity. The results indicated a statistically significant negative correlation with a relatively strong negative association between time providing services and non-counseling duties ( $rpb = -.521, p < .001$ ), with those school counselors who provide 80% of direct and student support services reporting less non-counseling duties ( $M = 4.58\%, SD = 6.21$ ) than those who do not spend 80% of their time in direct and student support services ( $M = 21.53\%, SD = 22.00$ ). There was no statistically significant relationship between student enrollment or student race/ethnicity and the provision of direct and student support services. Additionally, to answer the second research question, we used Fisher’s exact test to examine the relationship between 80% direct and student support services delivery and four variables: school counselor ratios for 2019-2020, school level, Title I status, and location. A significant relationship with a moderate negative association was found between 80% direct and student support services delivery and school level ( $p < .001, \phi = -.324$ ) with elementary school counselors (61.8%) reporting that they were more likely to provide 80% student services than secondary school counselors (32.4%). The other three variables did not have a significant relationship with counselors’ report of their ability to provide 80% direct and student support services.

**Research Question 3**

80% direct and student support services delivery and serving as standardized testing coordinator ( $p = .006, \phi = -.262$ ); new student enrollment ( $p = .016, \phi = -.223$ ); entering disciplinary referrals ( $p = .016, \phi = -.223$ ), and other duties/tasks ( $p = .018, \phi = -.207$ ). School counselors with those tasks were less likely to provide 80% direct and student support services. Although not related to engaging in 80% of appropriate services, a large number of school counselors reported serving as Section 504 coordinators ( $N = 72, 54.5\%$ ). This information is included in Table 2.

**Research Question 4**

Research question 4 examined changes that occurred due to the policy. If no changes were indicated, school counselors were asked to identify the underlying reason(s). Almost one-half of the school counselors reported that they did not experience any noticeable change in their roles and responsibilities subsequent to the policy taking effect; however, of these, approximately one-fourth of the school counselors who provided 80% direct and student support services reported that they already had a comprehensive school counseling program (CSCP) in place before the policy. Additional reported reasons accounting for the absence of change included: (a) insufficient funds ( $n = 10, 7.6\%$ ); (b) BEP funds allocation ( $n = 4, 3.0\%$ ); (c) lack of support ( $n = 15, 11.4\%$ ), and (d) other ( $n = 10, 7.6\%$ ). A significant relationship, with a moderate negative association, was found between the school counselors’ ability to provide 80% direct and student service delivery

**Table 3**  
**District/School Response to Policy**

	80% Direct Service Delivery				Total	
	Definitely No/Probably No (n = 30)		Definitely Yes/Probably Yes (n = 102)		(n = 132)	
<b>Removal of Duties</b>	<i>n</i>	%	<i>n</i>	%	<i>n</i>	%
Standardized Testing Coordinator	6	20.0	30	29.4	36	27.3
Section 504 Coordinator	0	0	4	3.9	4	3.0
RtI Coordinator	0	0	9	8.8	9	6.8
Other	0	0	8	7.8	8	6.1
Increase Other Duties	5	16.7	12	11.8	17	12.9
No Change in Duties	15	50.0	47	46.1	62	47.0
Reason No Change						
Already CSCP	0	0	24	23.5	24	18.2
Insufficient Funds	2	6.7	8	7.8	10	7.6
BEP Allocation	0	0	4	3.9	4	3.0
Lack of Support	8	26.7	7	6.9	15	11.4
Other	3	10.0	7	6.9	10	7.6

Note. N = 132

and the report of lack of support ( $p = .006, \phi = -.262$ ). All other Fisher’s exact tests were insignificant. Regarding changes that occurred post-policy, participants indicated the removal of the following duties: (a) standardized testing coordinator ( $n = 36, 27.3%$ ); (b) Section 504 coordinator ( $n = 4, 3.0%$ ); (c) RtI coordinator ( $n = 9, 6.8%$ ); (d) other non-counseling duties ( $n = 8, 6.1%$ ). Conversely, some school counselors ( $n = 17, 12.9%$ ) reported an increase in other responsibilities since policy implementation, although the nature of these new duties was largely unspecified. There were no statistically significant differences between the removal of these duties or the increase in other duties in relation to school counselors' ability to dedicate 80% of their time to direct and student service activities. This information is included in Table 3.

**Discussion**

Although a causal relationship cannot be inferred between the policy and school counselor ratios, we did find a statistically significant decrease in ratios one year following policy adoption. Undoubtedly this is a positive finding, given the research suggesting a salutary effect of lower school counselor caseloads upon student success across the social-emotional, academic, and career domains (Lapan et al., 2012). The purpose of Policy 5.103 was to protect school counselors from non-counseling duties and ensure that they would spend 80% of their time in direct and student support services delivery. As indicated by the results of research question 2, most of our participants spent 80% of their time in the provision of direct and student support services. Once again, this provides correlational evidence that Policy 5.103 has succeeded, in part, in meeting its intended goals not only to decrease ratios but also to improve students’ access to their school counselor. Since we did not collect data on pre-policy service delivery, we cannot claim a causal relationship between policy adoption and appropriate use of school counselors' time. Interestingly, we found no relationship between caseload size and the provision of direct and student support services. Similarly, we found no

relationship between school size and school counseling service delivery. Since we did not collect data on student outcomes, we cannot draw conclusions about school counseling programs' effectiveness in relation to participants' caseload or school size.

Perhaps more telling is the inverse relationship between non-counseling duties and school counselors' provision of direct and student support services. Specifically, school counselors’ capacity to provide students services was significantly related to serving as test coordinator, entering discipline referrals, enrolling new students, and other duties/tasks not specified in the survey instrument. The results of our study provide evidence to suggest that test coordination, along with discipline and enrollment duties compromise school counselors’ ability to adhere to a state-mandated policy, and, arguably, the provision of services outlined by ESSA, since school counselors saturated by excessive administrative tasks have less time to support the affective factors of learning that undergird student success. Interestingly, secondary school counselors indicated that they were less likely to provide 80% direct and student support services delivery than elementary school counselors. This resonates with the results of previous research findings that suggest secondary school counselors are more likely to engage in non-counseling activities (Fan et al., 2019).

Although not related to the ability to provide students' services, a large number of school counselors in our sample served as Section 504 coordinators and attendance monitors. School counselors' roles in these areas are complex. The ASCA has published position statements on appropriate school counselor roles in service to students with disabilities (ASCA, 2016) and analyzing attendance data and implementing interventions that address student attendance is in alignment with CSCP (Goodman-Scott et al., 2019). In this respect, Section 504 and attendance duties are not inherently in opposition to appropriate role functioning; rather, they become problematic when school counselors are expected to fulfill low-level administrative duties, such as data entry, that can accompany these roles.

Research question 4 examined descriptive categories associated with perceived changes, or lack thereof, related to Policy 5.103. Over 50% of the sample indicated no discernible change post-policy adoption. Further, approximately 25% of our sample suggest no need for role changes since they already implemented a CSCP. Out of the population who indicated that change had occurred, a promising 27% had been released from test coordination duties. Nonetheless, a salient factor among those school counselors who did not meet the target time in direct and student support services was a lack of support for their school counseling program. This finding underlines the notion that a supportive school administration is instrumental in the implementation of a CSCP (Gysbers & Henderson, 2012). While the removal of the test coordinator was not associated with the provision of 80% direct and student support services, the development of a CSCP takes both time and professional development. One could conjecture that those school counselors whose test coordination duties were recently rescinded are in the process of rebuilding their program and rearticulating their roles and relationships, which given sufficient time, will facilitate an increase in direct and student support services.

### **Considerations for Policy Development and Advocacy**

The findings of policy research are intended to inform and shape the agenda of policymakers, yet researchers and policymakers are often discussed as disconnected communities (Garcia, 2018). Policymakers, for instance, struggle to find relevance in academic work characterized by elongated literature reviews, complex methods, nuanced findings, and esoteric language, and in turn seldom pay attention to academics' expertise in matters affecting public policy. Thus, as the subset of school counseling research focused on policy emerges, scholars will be challenged to bridge the research-policy gap. A goal of this study was to stimulate complementary studies in those other states that have also enacted ratio and role realignment, yet the influence of policy research, including this study, is inherently limited by its academic structure and vernacular. To address the barriers associated with the utility and reach of policy research, we encourage researchers to follow the recommendations outlined by Garcia (2018).

First, researchers should keep in mind that policymakers want to know how the results of research apply to their constituents (Garcia, 2018). Thus studies, such as this one, which utilize state-level samples may have a greater influence upon state policy, as results are more applicable to policymakers' contexts. Second, when policymakers solicit expert perspectives, academics do not occupy a privileged position; instead, they are more likely to seek input from intermediary organizations (IOs), inclusive of professional associations, school reform organizations, think tanks, and foundations (Garcia, 2018). With this in mind, researchers are encouraged to form partnerships with IOs as a mechanism to increase the visibility of their research in those forums, more likely to be accessed by policymakers. Third, because policymakers prefer research that is written

in plain language and easy to apply, in addition to composing academic manuscripts, policy researchers should plan to translate their research in a manner accessible to a novice-level research consumer. Following these suggestions, we produced a 1-page fact sheet summarizing our major findings, which interested stakeholders could efficiently read. Through our partnership with an IO, our state school counselor association, we posted the document on their website. Moreover, the document has been used by the state school counselor association as a tool to educate and negotiate for policy adherence in multiple advocacy contexts with policymakers, their staffers, and the DOE.

From the perspective of policy analysis studies, we conducted this study in a relatively short time frame following adoption, which precluded us from conducting correlational analyses to examine the relationship between those school counseling programs compliant with policy 5.103 and student success indicators. Although we endeavored to increase the readability of our research and partnered with an IO with whom our state policymakers are more likely to interact, this study did not investigate a relationship between school counselor ratios and student services with student achievement. Nonetheless, impressive data has emerged from Colorado, which in 2008 passed House Bill 08-1370-School Counselor Corps Grant Program (SCCGP), intended to decrease school counselor ratios in highly diverse, economically disadvantaged schools. At the two-year threshold, following funding, SCCGP schools consistently witnessed a decline in dropout rates and a corresponding increase in graduation rates and postsecondary enrollment (Colorado Department of Education, n.d.). Moreover, by comparing outcome data of SCCGP schools to non-funded schools and identifying the cost savings of the program to both school and society, new SCCGP cohorts have been added each year since program inception (Colorado Department of Education, n.d.). Furthermore, Colorado School Counselor Association served as an instrumental policy advocate and informant during the policy formulation process and once again provides evidence of the value of partnerships between policy research and IOs. Although the role of university academics in producing the research is unclear, Colorado's case demonstrates the primacy of conducting policy research that provides a linkage between investment in school counselors and school counselor-led programs with high impact student outcomes most relevant to policymakers.

### **Limitations**

While a flexible tool for gathering data from large, geographically dispersed populations, survey research has several limitations applicable to the study design and results. First, survey data relies on self-reported data, susceptible to respondents' tendency to distort responses in a favorable direction (e.g., social desirability). Second, surveys seldom yield data about the context of social life and can be a superficial tool to gather data on complex topics. To a certain extent, our survey lacked depth due to the utilization of multiple-choice and dropdown responses. While this

design choice increased completion rates, it precluded the gathering of rich qualitative data. Nonetheless, we did provide "other" as a response option to many items, in addition to the opportunity for respondents to qualify this answer in a text box. Unfortunately, the preponderance of respondents who selected this choice did not specify the nature of this category, in turn limiting its value as a stand-alone variable for data analysis. Further, although we collected data on school variables such as size, demographic make-up, and SES, we know very little about how school and community culture mediated policy adoption. Finally, the survey was not sensitive to internal counselor variables, such as role diffusion or burnout, which may compromise their ability to respond to the policy change.

Since we deployed a purposive sampling procedure, we recognize that we could have continued to recruit participants after initial data collection. However, to control for the influence of time upon policy implementation, we terminated data collection after a 4-week response window. As a consequence of our small sample, we combined the middle school and high school responses into one variable, secondary; yet middle school has 6th grade, which is sometimes considered elementary. While the sample was large enough to find some significant results, it was a small percentage of the total population of public-school counselors in Tennessee, estimated to be over 2,000 school counselors (Tennessee Department of Education, 2021). A larger sample would have increased the generalizability of findings, as well as impacted the significance levels and practical importance of the results. Despite the multiple noted limitations of the survey tool and sample, our findings are valid to the extent they correspond to previous studies that have identified factors that adversely affect school counselors' time (Chandler et al., 2018; Dahir et al., 2009; Fan et al., 2019), and thus present some evidence of concurrent validity.

In regard to the data analysis, interpreting correlations on a small sample of the population needs to be performed cautiously due to the possibility of sampling error. Additionally, point-biserial correlation can be impacted by the dichotomous nature of one of the variables, which constrains the variability of the results (Hinkle et al., 2003). Nonetheless, correlational analyses of ordinal and nominal variables in small-scale research are consistent with our exploratory design, insofar as results provide preliminary evidence that the variables examined share some type of relationship, and merit follow-up research. For instance, future researchers could create a standardized instrument, informed by our pilot results, and utilize regression analysis to estimate the predictive power of the independent variables (e.g., non-counseling duties, school support) relative to the dependent variables (e.g., time spent in direct and student support services).

### Conclusion

Policy 5.103 was introduced at a time when the needs of school populations are more acute than ever: School leaders must address the exigencies of school accountability, close

the achievement gap experienced by historically marginalized groups, address the needs of the whole child, reduce instances of bullying in an ever-complex digital environment, and attend to students' declining mental health issues, all while fostering fruitful postsecondary outcomes. In this climate, school counselors are an indispensable resource, yet their potential contributions are often unrealized due to an excessive delegation of non-counseling duties. The results of this study yielded promising data to indicate that subsequent to a state policy change, school counselor ratios declined, and rates of direct and student support services may have increased. Nonetheless, our findings echo what educational policy researchers identify as the uneven adoption of educational policy from the state to the local level, with a lack of support cited as a salient factor underpinning no change at the district level.

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