

Goshen Central School District

Mental Health Training Component of the New York SAVE Act

JUNE 2022



OFFICE OF THE NEW YORK STATE COMPTROLLER
Thomas P. DiNapoli, State Comptroller

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Report Highlights

Goshen Central School District

Audit Objective

Determine whether the Goshen Central School District (District) used District resources to provide the mental health component of the New York Safe Schools Against Violence in Education Act (SAVE Act) training requirement to staff.

Key Findings

The District did not provide mental health training to all staff for the 2020-21 school year by September 15, 2020 as required by New York State Education Department (SED) regulations.

- One of the 12 recommended components of mental health that educators should know was not included in the District's training offered to the high school teaching staff.
- Five of the 12 recommended components of mental health that educators should know were not included in the District's training offered to the teaching staff at the two elementary schools.

District officials did not maintain documentation to support attendance for trainings and we were unable to determine which staff members participated.

Key Recommendation

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

District officials generally agreed with our recommendation and indicated they will take corrective action. Appendix B includes our comment on the District's response.

Background

The District is located in Orange County, and is governed by an elected seven-member Board of Education (Board).

The Board is responsible for the general management of the District.

The Superintendent serves at the Board's direction and is responsible for day-to-day management.

The Superintendent is the Chief Emergency Officer and is responsible for coordinating emergency plan training for staff.

Quick Facts

2020-2021 School Year

Staff	724
Students	2,823
School Buildings	4

Audit Period

July 1, 2020 – June 30, 2021

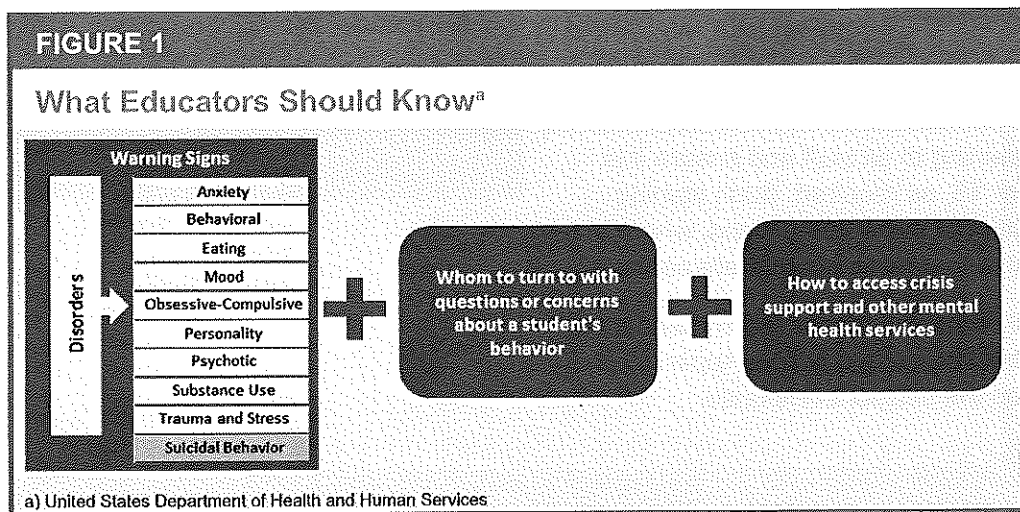
Mental Health Training

The SAVE Act was introduced to help improve school safety. The SAVE Act requires school districts to develop a comprehensive district-wide school safety plan (safety plan) that addresses crisis intervention, emergency responses and management. The safety plan developed by each district must include, among other things, policies and procedures for annual school safety training for staff and students. School districts must certify to the SED Commissioner that all staff have undergone the school safety training, which must include a component on mental health.¹ SED requires that the certification to the SED Commissioner states that all staff have undergone the annual training by September 15 of each year.

What Is the Mental Health Component of the SAVE Act Training for All Staff?

The SAVE Act requires all districts to provide staff annual emergency response plan training with a component on mental health. School personnel are often the first to notice mental health problems, and, to support the mental health of a district's students.

While the SAVE Act and SED requirements state that the annual school safety training must include a component on mental health, neither the SAVE Act nor SED requirements directly address what topics should be included within the mental health training component. Rather, SED issued guidance to all school districts that included resources relating to mental health. Included within the resources was information from the U.S. Department of Health and Human Services (DHHS) addressing "what educators should know" regarding warning signs of mental health problems, "whom to turn to," and "how to access crisis support and other mental health services" (Figure 1).



1 8 NYCRR Section 155.17[c][1][xiii]

Based on SED guidance, as a best practice, at a minimum staff should be trained on the DHHS recommended mental health components of “what educators should know.”

District Training Did Not Include All Recommended Mental Health Components and Training Was Not Provided to All Staff

The previous Superintendent certified to SED that all staff received training on the emergency response plan on September 1, 2020, which must also include training on a component of mental health.

The Assistant Superintendent of Curriculum, Instruction, Personnel and Technology (Assistant Superintendent) told us training that included mental health content was provided in the District’s “Dignity for All Students Act” (DASA) training, School Safety-NY training, “The 20-21 School Year: Different, Challenging, Uncertain...” (20-21 DCU) training and “Addressing Mental Health Concerns in the Time of COVID” (AMHCC) training attended by staff.

We reviewed the materials presented for these trainings and found that 11 of the 12 recommended mental health components were included in the AMHCC training (Figure 2). Missing from the AMHCC training was the warning sign for Obsessive-Compulsive Disorder. The

Figure 2: District’s Mental Health Training

Mental Health Components	Included	
	AMHCC	20-21 DCU
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	✓	✓

AMHCC training was offered only to the high school teaching staff. The 20-21 DCU training included six of the 10 warning signs (Figure 2). Missing from the training were the warning signs for obsessive-compulsive disorder, psychotic disorders, substance use disorders, suicidal behavior and whom to turn to. The

20-21 DCU training was only offered to the teaching staff at the two elementary schools. The Assistant Superintendent told us that none of the teachers or staff at the Middle School were offered training.

In addition, we did not consider the content of the DASA and School Safety-NY training to satisfy the requirements on providing training on a component of mental health. The DASA training focused on raising awareness and sensitivity to potential acts of discrimination and harassment, and the School Safety-NY training focused on creating a school safety plan and federal emergency management standards. Neither training focused on the recommended mental health warning signs, “whom to turn to” and “how to access crisis support and other mental health services.”

The Assistant Superintendent told us the AMHCC and 20-21 DCU trainings were offered during the Superintendent’s Conference days held at the various schools between September 1 through 4, however, documentation to support attendance for these trainings was not maintained. Therefore, which staff members participated in the trainings could not be determined. The Assistant Superintendent also told us that he was not aware of the specific details of the mental health training requirement or the recommended warnings signs of what educators should know.

It is imperative, especially during the COVID-19 pandemic, that staff be provided training on warning signs that may be an early indicator of mental health issues and concerns. Training staff can assist in identifying mental health issues in students early on to get help when needed and potentially avoid having to react to crisis situations or emergencies.

What Do We Recommend?

District officials must:

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

Appendix A: Response From District Officials



Kurtis M. Kotes
Superintendent of Schools

227 Main St., Goshen, NY 10924 ■ (845) 615-6720

Ms. Julie Landcastle
Chief Examiner
Statewide Audit
State Office Building, Suite 1702
44 Hawley Street
Binghamton, New York 13901-4417

February 2, 2022

Dear Ms. Landcastle:

The Goshen Central School District is in receipt of the Mental Health Training Audit, Report, Examination, S9-21-9. The District held an exit conference with the Office of the State Comptroller on January 14, 2022 at 2:00PM. The meeting was held virtually.

The District appreciates the opportunity to hold a joint exit conference and have an opportunity to collaboratively discuss the findings of the audit with the representatives of the Office of the State Comptroller.

The purpose of this letter is to provide a written response to the draft findings of the above stated audit.

The draft audit issued four key findings regarding the required mental health training components for staff throughout the district. Those findings included:

- The District did not provide mental health training to all staff for the 2020-2021 school year by September 15, 2020 as required by New York State Education Department (SED) regulations.
- One of the 12 recommended components of mental health that educators should know were not included in the District's training offered to the high school teaching staff.
- Five of the 12 recommended components of mental health that educators should know were not included in the District's training offered to the teaching staff at the two elementary schools.
- District Officials did not maintain documentation to support attendance for trainings and we were unable to determine which staff members participated.

The District would benefit from additional trainings and reminders regarding the required mental health training for staff throughout the District. As is evidenced by the fact that the District did engage in training for the staff during the 2020-2021 school year, the District does understand it's obligation to complete this training for the staff and the importance of doing so. Additional resources and/or training would further strengthen the training for our staff and assist the District with being compliant with the New York State Department of Education requirement.

The District does disagree with the finding surrounding attendance at the trainings. The District maintains [REDACTED] attendance system for purposes of tracking staff attendance. The District is clear on who was in attendance on the days of the trainings and who was not. All employees present on the stated days of

See Note 1 Page 7

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Kurtis M. Kotes
Superintendent of Schools

227 Main St., Goshen, NY 10924 ■ (845) 615-6720

trainings were directed and expected to be in attendance at the trainings. Building Administrators and Department Directors regularly follow up with those who may have been absent on the day of a training and provide them a mechanism to still have access to the required training. The assumption that since the District did not maintain a specific sign-in list for each training does not equate to the District's ability to ascertain accurate attendance at required meetings. .

See
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The District appreciates the opportunity to provide this response letter to the Office of the State Comptroller. District Administration is already working to process our Corrective Action Plan to be submitted under separate cover at a later date.

Please do not hesitate to contact me should other information be required.

Respectfully submitted,

Dr. Kurtis M. Kotes
Superintendent of Schools

Cc: Mr. Jason Pucci, President of the Board of Education
Mr. Richard Linden, Interim Assistant Superintendent for Business

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Appendix B: OSC Comment on the District's Response

Note 1

While the attendance system may track daily absenteeism and attendance for District staff, it does not capture staff attendance for the specific training presentations provided on Superintendent's Day. Officials were unable to provide supporting documentation such as a sign-in sheet or attestations to show which staff attended the specific trainings included in our audit.

Appendix C: Audit Methodology and Standards

We conducted this audit pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law. To accomplish our audit objective and obtain relevant audit evidence, our procedures included the following steps:

- We selected the District for audit using a random number generator applied to a list of districts, broken out by five geographic regions (excluding NYC schools), not currently in the OSC audit process at the time of selection. The list was broken out by geographic region for an even representation of school districts across the State for this multi-unit audit.
- We interviewed District officials to gain an understanding of the process for creating, disseminating and monitoring mental health training for staff.
- We reviewed relevant State laws and regulations, and guidance from SED and the United States Department of Health and Human Services. We reviewed District policies to gain an understanding of required mental health training.
- We reviewed Board minutes for the 2020-21 school year to determine the Board action taken related to the District-wide safety plan or required mental health training.
- We requested and reviewed records supporting the District's 2020-21 certification to SED that required annual training with a component of mental health.
- We reviewed and tested the mental health training materials provided by the District to determine if training on mental health followed guidance.
- We determined the total number of individuals employed by the District during our audit period by obtaining and reviewing an employee listing.

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

The Board has the responsibility to initiate corrective action. A written corrective action plan (CAP) that addresses the findings and recommendations in this report must be prepared and provided to our office within 90 days, pursuant to Section 35 of General Municipal Law, Section 2116-a (3)(c) of New York State Education Law and Section 170.12 of the Regulations of the Commissioner of Education. To the extent practicable, implementation of the CAP must begin by the end of the fiscal year. For more information on preparing and filing your CAP, please refer to

our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. The CAP should be posted on the District's website for public review.

Appendix D: Resources and Services

Regional Office Directory

www.osc.state.ny.us/files/local-government/pdf/regional-directory.pdf

Cost-Saving Ideas – Resources, advice and assistance on cost-saving ideas

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

Fiscal Stress Monitoring – Resources for local government officials experiencing fiscal problems

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

Local Government Management Guides – Series of publications that include technical information and suggested practices for local government management

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

Planning and Budgeting Guides – Resources for developing multiyear financial, capital, strategic and other plans

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

Protecting Sensitive Data and Other Local Government Assets – A non-technical cybersecurity guide for local government leaders

www.osc.state.ny.us/files/local-government/publications/pdf/cyber-security-guide.pdf

Required Reporting – Information and resources for reports and forms that are filed with the Office of the State Comptroller

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

Research Reports/Publications – Reports on major policy issues facing local governments and State policy-makers

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

Training – Resources for local government officials on in-person and online training opportunities on a wide range of topics

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

Contact

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

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

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

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

STATEWIDE AUDIT – Julie Landcastle, Chief Examiner

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

Tel (315) 793-2484



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Office of State Comptroller
Division of Local Government & School Accountability
PSU – CAP Submission
110 State Street, 12th Floor
Albany, New York 12236

April 7, 2022

To Whom It May Concern:

Unit Name: Goshen Central School District
Audit Report Title: Mental Health Training Audit
Audit Report Number: S9-21-29

For each recommendation included in the audit report, the following is our corrective action(s) taken or proposed. For recommendations where corrective action has not been taken or proposed, we have included the following explanations.

Audit 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.

Implementation Plan of Action(s):

The Goshen Central School District utilizes a Google Slide Presentation entitled “Addressing Mental Health Concerns in the Time of COVID” (AMHCC) to provide the necessary mental health training to all faculty and staff members in our 6-12 schools and “The 20-21 School Year: Different, Challenging, Uncertain...” (20-21 DCU) in our K-5 schools. As we move in to the 2022-23 school year, the District will edit these documents so that each meets the necessary training requirements in the area of mental health. The AMHCC document will be edited to include information regarding Obsessive-Compulsive Disorder, while the now titled 20-21 DCU document will be edited to include information regarding Whom to turn to for assistance, Obsessive-Compulsive Disorder, Psychotic Disorders, Substance Use Disorders, and Suicidal Behavior. Additionally, the District will require a signature from each employee in attendance during the presentation provided during Superintendent’s Conference Day, prior to September 15 of the school year, as required by New York State Education Department regulations and the New York Safe Schools Against Violence in Education Act.

Implementation Date:

The Goshen Central School District will edit these documents prior to Superintendent’s Conference Day to be held on August 31, 2022. A sign-in sheet will be utilized during the presentations on this day as well. Employees that were not present during the conference day (8/31/2022) will be asked to view the presentation and also sign-



CENTRAL SCHOOL DISTRICT

Kurtis M. Kotes
Superintendent of Schools

227 Main St., Goshen, NY 10924 ■ (845) 615-6720

in, confirming that the employee received the appropriate training. This will also be completed prior to September 15, 2022.

Person Responsible for Implementation:

Jason Carter, Assistant Superintendent for Curriculum, Instruction, Personnel, and Technology

Respectfully,

Kurtis M. Kotes, Ed.D.
Superintendent of Schools