



March 5, 2024

Representative Laurie Pryor  
Chair, House Education Policy Committee  
Room 571, State Office Building  
St. Paul, MN 55155

Dear Representative Pryor:

The Minnesota School Psychologists Association (MSPA) would like to voice these concerns regarding HF 4512 (Berg) that will be before your committee on Wednesday, March 6. MSPA would like to thank Representative Berg for her hard work last session playing an instrumental role in the establishment of the Student Support Personnel Aid funding stream. The revenue flowing to school districts from that program should go a long way towards ensuring students throughout Minnesota will have access to a broad range of academic, mental health, and health-related resources.

In view of the recent implementation of this revenue stream, MSPA believes it is premature to suggest student-to-staff ratios should be set solely for school counselors without analyzing more thoroughly the student-to-staff ratios in the other student support personnel categories to determine whether they also exceed the recommended guidelines for each employee group. MSPA can share information as to how the ratio of student-to-school psychologists goes well beyond the guidelines necessary to meet student needs developed by the National School Psychologists Association.

School districts are in the best position to determine their particular needs when it comes to developing their systems of student support and although the language in HF 4512 only encourages districts to reach a certain ratio, the language could be interpreted by school districts to mean that the ratio related to school counselors is the first imbalance that needs to be addressed. That would not only be disadvantageous to the other student support personnel groups, but may also lead to students not having access to a broader range of student support services that aren't provided by school counselors.

MSPA also has concerns regarding the language in Clause (3) that is found on Page 2, beginning at Line 6. School counselors are in a position to refer students to appropriate mental health practitioners, but the language in Clause (3) indicates that they could deliver mental health services. School counselors are not licensed mental health practitioners and the question arises as to whether they should be providing direct mental health services.

MSPA looks forward to continuing working with Representative Berg in her efforts to ensure that students receive sufficient support services and thanks her for her past support for this important goal.

Sincerely,

Damion Smith  
President, Minnesota School Psychologists Association

Representative Laurie Pryor, Chair  
Education Policy  
March 6, 2024

Chair Pryor and Education Finance Committee Members,

Thank you for your attention to the social emotional needs of students. On behalf of the MN School Social Workers Association (MSSWA) and the National Association of Social Workers, MN Chapter (NASW-MN), we are writing about concerns regarding HF4512.

NASW-MN is the largest membership organization of professional social workers in our state, representing over 2000 social workers, and MSSWA is a professional group serving over 700 members to advance the practice of school social work in MN. Collectively, our organizations offer experience and expertise in children's mental health and wellness in schools.

School social workers, nurses, psychologists, counselors, and chemical health counselors work together to address the increasingly complex student needs that show up in schools across MN every day. While we support the intention of ensuring that staff are available to serve students, we are concerned that HF4512 will force school districts to prioritize school counselor positions over others on the school support personnel team.

We know that students cannot learn if their mental health and physical needs are unmet, and there is no one member of the school support personnel team who can address these needs alone. School social workers believe it is more effective to target resources to funding school support personnel, as the Legislature did in 2023, rather than suggest ratios for each position.

HF4512 spells out new scope of practice definitions for school counselors that significantly expand upon their role defined in Minnesota Rule 8710.6400. We are concerned that some of the new definitions suggest a mental health role for which school social workers who hold a clinical license or others are better suited to fill. Because school counselors are closely tied to other school support personnel, we would like the opportunity to engage with advocates and Legislators to ensure that HF4512 does not inadvertently conflict with other professional scope of practice regulations, licenses, and statutes, including Minnesota Statutes Chapter 148E which defines social work practice, and Minnesota Statutes Chapter 245I.04 which specifies qualifications for mental health professionals and practitioners.

We believe it is essential that we serve the whole child in our schools, and counselors play an essential role. We ask you to support their profession in a way that does not undermine social workers or other school support personnel.

Thank you for your consideration.

Sincerely,  
Karen E. Goodenough, PhD, LGSW  
Executive Director  
NASW-MN

Christy McCoy, MSW, LICSW  
Legislative Chair  
MSSWA