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The Honorable Arne Duncan  
Secretary  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

October 26, 2015

Dear Secretary Duncan:

On behalf of the National Association for College Admission Counseling (NACAC), thank you for the opportunity to submit comments on the proposed Study of Enhanced College Advising in Upward Bound.

Founded in 1937, NACAC is an association of over 15,000 college admission officers, school counselors, independent education consultants, and other professionals who work with students as they transition to postsecondary (“college”) education. NACAC is committed to maintaining professional standards that foster ethical and social responsibility among those involved in the college application and enrollment process, as outlined in the NACAC Statement of Principles of Good Practice (SPGP), which is available on our website. Through our advocacy efforts, we are also dedicated to ensuring all students have access to high quality school counseling to help them make informed decisions as they prepare for college or career. NACAC is pleased that the Department of Education is taking steps to study how support of school counselors will benefit the students they serve.

Anecdotal and objective evidence illuminates the important role school counselors play in maximizing the likelihood students will plan for and pursue postsecondary education. Despite this, public school counseling offices are woefully understaffed and under-supported. The American School Counselor Association and NACAC recommend a student-to-counselor ratio of no more than 250:1, but in the 2012-13 school year, the national average ratio was 482:1. The difficulty of adequately working with each student while managing such high caseloads is compounded by the fact that counselors are regularly tasked with duties not related to postsecondary planning. According to NACAC research, in low-poverty schools, 60% of counselors report spending more than 20% of their time on college readiness activities; in high-poverty schools, only 43% of counselors are able to dedicate this amount of time to college preparation. (Radford, A., “A National Look at the High School Counseling Office: What Is It Doing and What Role Can It Play Facilitating Students’ Paths to College?” NACAC, 2015) In light of the obstacles hindering



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students, particularly those in under-served communities, from receiving thorough college guidance, studies like the proposed Study of Enhanced College Advising in Upward Bound are all the more important.

Research reveals positive correlations between schools with robust college advising services and a propensity among students to demonstrate college-going behavior and college matriculation. (Roderick, M., et al. "From High School to the Future: Potholes on the Road to College." The University of Chicago Consortium on Public School Research, 2008; NACAC, supra). In 2013, only 34% of public high schools required school counselors involved with postsecondary advising to participate in related professional development. Of those schools, only 30.5% covered all costs of the training. (Clinedinst, M. "State of College Admission." NACAC, 2014). Another barrier to accessing professional development is created by the uncertainty many principals express as to whether Title II funds may be used by school counselors. Although the Department has issued guidance that Title II may be used by school counselors, school leaders are hesitant to allocate already limited financial resources to professionals not explicitly included in the statute's authorizing language.

NACAC hopes that the Department's Study of Enhanced College Advising in Upward Bound will produce a greater body of evidence demonstrating the importance of professional development and access to resources for those who help students navigate the college admission process. In applying to and selecting a college, students must balance a wide array of considerations, including cost, location, and academic offerings. They must also manage a timeline that consists of multiple deadlines, tests, forms, and other requirements. Finding the right college is a complicated process for any student, but the challenges are accentuated for first-generation and low-income students, who are less likely to have close friends or family members who have attended college, and, as discussed above, whose schools are less likely to provide substantial college guidance services.

To be most effective, counselors need to be able to provide individualized guidance that is sensitive to each student's particular needs and desires. Focusing on counselors' effectiveness is imperative in order to maximize the limited amount of time they can spend with students on postsecondary advising. Through our Essentials of Professional Development program, NACAC partners with public school districts around the country to provide one-day learning opportunities about college advising. Training opportunities like these help counselors understand the landscape of college admissions and how they can create a college-going culture within their school, and we are excited that the Department will include staff training as a component of this study.

NACAC has long advocated for more effective dissemination of the Department's resources that may help counselors and students throughout the college application process. Because of limited time and resources, it can take years for all of the Department's resources to trickle down to school counselors, despite best efforts of groups like NACAC to publicize them. For this reason, we are pleased that the Department intends to include distribution of resources as part of the Study of Enhanced College Advising. We hope that the Department will use the results of this study to think about how it can better distribute resources to all counselors in the future, and will learn which types of resources are most useful to counselors and students.

Thank you again for the opportunity to comment on the Study of Enhanced College Advising in Upward Bound. NACAC is hopeful that the study will produce insights that assist the Department and school leaders in understanding how and why support of school counselors is essential to increasing postsecondary access and attainment for all students. For more information on NACAC, please contact Michael Rose, Associate Director for Government Relations, at [mrose@nacacnet.org](mailto:mrose@nacacnet.org).

Sincerely,

A handwritten signature in black ink that reads "Joyce K. Smith". The signature is written in a cursive, flowing style.

Joyce Smith, CEO