



ORIGINAL: 2208

Emma T. Lucas, Ph.D, LSW
President

Rebecca S. Myers, LSW
Executive Director
exec@nasw-pa.org

September 12, 2001

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SEP 14 2001

DOS LEGAL COUNSEL

State Board of Marriage and Family
Therapist and Professional Counselors
C/o Beth Michovitz, Board Counsel
116 Pine Street
Harrisburg, PA 17100

Dear Ms. Michovitz:

On behalf of the 6,700 social workers the Pennsylvania Chapter of the National Association of Social Workers represents, we feel compelled to formally outline our displeasure with the significant fee increase proposed by the licensing board for individual application for continuing education.

We certainly can understand a fee increase designed to assist with defraying mounting administrative and operational cost associated with the increased workload of the state licensing board. However we identify such a significant increase as a barrier that will make applying for individual approval of continuing education credits in Pennsylvania unattainable. We have repeatedly been notified that many organizations opt not to apply for continuing education approval because the process is so complex and cumbersome.

It would be our recommendation that the application fee for individuals applying for continued education remain at \$25. Thank you in advance for your consideration in regards to this matter. We look forward to working with you directly and the licensing board in its entirety.

Sincerely yours,

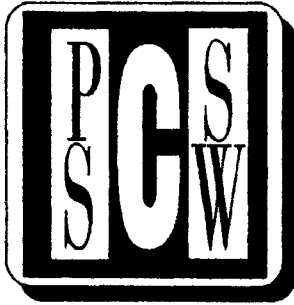
Ebonnie L. Simmons Hall, MSW
Government Relations Specialist
PA-NASW

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SEP 14 2001
DOS LEGAL COUNSEL

PENNSYLVANIA CHAPTER

National Association of Social Workers

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**Pennsylvania Society
for
Clinical Social Work**

616 West Cliveden Street, Phila., PA 19119-3601
215-844-1995



ORIGINAL: 2208

September 21, 2001

John Jewett, Jim Smith and Colleagues
Independent Regulation Review Commission
333 Market Street, 14th floor
Harrisburg, PA 17101

Re: Proposed Rulemaking: [49 PA. Code CHS. 47-49]
Fees

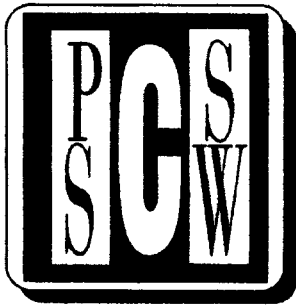
Dear Mr. Jewett, Mr. Smith and Colleagues:

Please find enclosed a copy of the letter sent to the Pennsylvania Licensing Board for Social Workers, Marriage and Family Therapists and Professional Counselors today. We appreciate the work your organization has been doing with the Act 136 regulations. We hope you will consider these comments as well.

Sincerely yours,

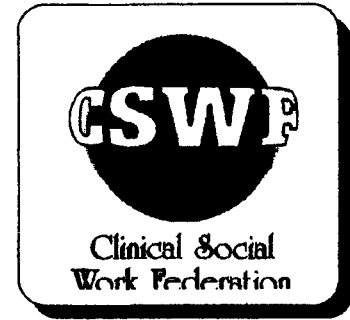
Virginia C. McIntosh, Co-Chair of the Licensing Committee

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INDEPENDENT REGULATION REVIEW COMMISSION



**Pennsylvania Society
for
Clinical Social Work**

616 West Cliveden Street, Phila., PA 19119
215-844-1995



September 20, 2001

Thomas Matta, Ph.D., Chairman
State Board of Social Workers, Marriage and Family Therapists
and Professional Counselors
P.O. Box 2649
Harrisburg, PA 17105-2649

Re: Proposed Rulemaking: [49 PA. Code
CHS.47-49] Fees

Dear Dr. Matta:

We would like to comment on the proposed raise in the biennial renewal of LSW fees, from \$15 to \$25, and the proposed new fee for the LCSW, \$45; but the main point of our comments in this letter are about raising the price of approval of workshops from \$25 to \$40, a 60% increase. We think this last raise is too much and the most troublesome.

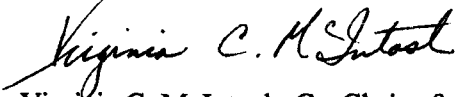
RE: 47.34. Registration of continuing education providers, courses and programs.

- (b) An applicant for Board Approval as a provider of a course or program shall submit an application, along with a fee of [~~\$25~~] \$40, at least 90 days before the date of the course or program commences.

It is not clear in the Rulemaking whether this fee for a course application pertains only to organizations or whether it also pertains to professional social workers who are requesting approval of a program they might desire to attend. Either way, it adds considerably to the cost of a workshop for the professional. I've heard from national and international organizations, which have annual conferences, that to pay such fees to many state Boards adds to their costs in fees paid and in staff time. That is why many conferences, providing excellent professional education that our members wish to attend, do not seek approval to offer CEs to Pennsylvania social workers. Since Pennsylvania requires 20 CEs per year, this is a burden to our members, not to be able to take advantage of those workshops which are needed for their practice and to pay such a high price for those they do attend. I think other states' regulations do not cost organizations either as much money nor as much time and effort, as the Pennsylvania Board does. As you see, the Board requires 90 day advance application as well and often speakers are not totally confirmed that far in advance. This prevents more spontaneous workshops, such as one on Trauma Debriefings we are having on 9/23, to address the aftermath of the current terrorism crisis. This part of this regulation, having to apply 90 days in advance, is also a large obstacle for non-preapproved organizations. There needs to be a way to make this more workable and affordable.

Returning to the fee increase issue, we are very aware that fees have to increase with inflation over time. However, we were struck by the leap of the fee structure in the Proposed Rulemaking. Considering the influx of large groups of therapists into this pool of people and that salaries for all social workers have decreased in recent years, it seems precipitous to raise all fees by so much. The proposed biennial renewal fee is a jump of 66%, while the LCSW application fee is three times the current \$15 LSW fee! We think that since the PA. Licensing Board has yet to see what the total cost of such large groups will be, these dramatic leaps in the fee structure are a mistake.

Sincerely yours,

A handwritten signature in cursive script that reads "Virginia C. McIntosh".

Virginia C. McIntosh, Co-Chair of the Licensing Committee
Pennsylvania Society for Clinical Social Work