

3

IRRC

From: James Corbin [jcorbin@mcdaniel.edu]
Sent: Monday, May 09, 2005 6:13 PM
To: IRRC
Subject: Proposal for Continuing Educational Credits for Social Workers - #16A-6912, (#2479)

To Whom It May Concern,

I am a registered voter and licensed social worker in Pennsylvania. I just wanted to briefly state my opposition to the deletion of the portion of the proposal for regulation #16A-6912, (#2479) allowing social workers to write the board for credit for an event after its completion.

There are many credit worthy events that occur both in-state and otherwise that fulfill the intent and effort towards professional licensed social workers to continue in their educational process throughout their professional careers. There have been instances when these opportunities present themselves in an opportune fashion that may not allow enough time for a professional, with many of their other competing demands, to apply for credit prior to the event occurring. It seems that the rigidity of disallowing someone to obtain credit for their time and effort following the CEU event is not in keeping with the true spirit of this regulation, namely that professionals need to participate in such events.

In addition to protecting the consumer and members of the profession, the state board should also shepherd the efforts of its constituents and professionals who have earnestly fulfilled the requirements of attending said event even if they are informed after the fact. Unwarranted regulation should not impinge on their livelihood simply because the notification to their professional board happened after the event. I thank you for your time and consideration in this matter.

Respectfully submitted,

James R. Corbin, MSW, LSW

cc: John R. McGinley, Jr. Chairman, IRRC

RECEIVED
2005 MAY 10 AM 9:06
REVIEW COMMISSION

Original: 2479

IRRC

From: Tony Mastroianni [mastroiannias@yahoo.com]
Sent: Monday, May 09, 2005 12:54 PM
To: IRRC
Subject: Regulation numbers: #16A-6912, (#2479).

John R. McGinley, Jr. Chairman, IRRC

Dear Chairman McGinley,

I am writing in regard to changes in the rules for continuing education units for Professional Counselors, Marriage and Family Therapists and Social Workers. Specifically in reference to regulation numbers: #16A-6912, (#2479). I am concerned that the entire section allowing individuals to apply to credit is deleted. I believe this should be retained AND that individuals should be able to seek board approval for a continuing education event at any time rather than the current practice of needing to apply PRIOR to attendance.

Sincerely,

Anthony S. Mastroianni, LSW
Southwest Division Chair
PA-NASW
412-670-4538

2005 MAY -9 PM 1:37
RENEW COMMISSION

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2005 JUN -3 PM 12:32

REVIEW COMMISSION

Original: 2479

May 31, 2005

State Board of Social Workers, Marriage
and Family Therapists and Professional Counselors
c/o Sandra Matter, Administrative Assistant
PO Box 2649
Harrisburg PA 17105-2649

Dear Members of the Board:

Thank you for your work on the proposed rulemaking of continuing education regulations as published in the April 30th *Pennsylvania Bulletin*. NASW-PA, based upon our review of the regulations, believes the regulations balance the Board's charge to protect the public while also meeting the needs of the regulated community. Although the regulations are balanced for the most part, we do have a few questions and comments that are outlined below.

Section 47.32(a)

We support the continued requirement for 30 hours of continuing education during each biennial renewal period, with 3 hours related to ethical issues.

Section 47.33(d)

NASW-PA appreciates the Board's recognition of the request we made in our February, 2002 letter to the Board regarding improvements for the continuing education process for licensees. We support the Board's approval of up to 20 CE hours of home study and the definition that home study courses require specific learning objectives and an evaluation to determine whether learning occurred. We also note the requirement that home study courses be identified as such on the certificate.

Section 47.34 (b)

We note the Board's increase in the provider application fee to \$45.00.

Section 47.34 (e)

We support the requirement that the Board approval number for a qualified provider be listed on the continuing education certificate. This makes it clear to providers and to licensees that the course was approved and gives the board some leverage if licensees report a provider did not list the number or listed a fraudulent number.

Section 47.34 (h)

We note the addition of this section and support providing a process for withdrawal of approval of a course.

Section 47.35 (b)

We support changing this language of this section to reflect federal, state and local laws serving people with disabilities.

Section 47.36

NASW-PA is pleased to see the increase in approved providers and approved entities that approve courses or providers. Most of these organizations offer excellent quality in their approval process and provider process and Pennsylvania social workers and the public they serve will greatly benefit from this expansion.

- You have clarified the previous drafting of this section to distinguish between groups that provide courses, groups that provide AND approve courses and groups that only provide courses. You also allow for courses approved by affiliates of NASW, which we requested in our earlier comments to you of January 2003.
- In our January, 2003 letter, we requested that you include courses approved by other state social work licensure boards. We do not see approval by another licensure board included in this proposal, nor did we ever receive any response to whether or not there was a rationale for not including them.

Section 47.36(b)

We thank the board for adding this section, which allows for additional organizational providers to be approved on a biennial basis. This was a suggestion we made in our January, 2003 letter.

Section 47.36(c) DELETED SECTION

We are concerned that the original 47.36(c) is being deleted. While these regulations greatly expand the available continuing education options, there may be situations not covered by them, which represent excellent continuing education. The deleted section (c) provided for this possible necessity. In our February, 2002 letter and again in our January 2003 letter, we requested a change to this section that would allow individuals to apply for board approval of a course not otherwise approved at any time during the licensure period. There are excellent courses that may not be pre-approved and licensees should have the right to work with the Board towards approval, even after having taken the course. Although we concur that the most desirable process would be to approve the course prior to attending, there are times when this process isn't feasible.

Because the course content does not change and there are times when the information required for course approval are more readily available after attendance, NASW-PA requests that the Board allow the licensee to seek approval either before or after the course. If the Board is not willing to make this change, then we request the current regulations section 47.36(c) be included in these regulations.

We make this request based on the number of social workers who have paid fines for not meeting the continuing education requirements. In most cases, these licensees did in fact receive more than the required continuing education hours and received them from highly reputable sources, however, those sources were not deemed "approved" in Pennsylvania, and because Section 47.36(c) required licensees to apply for approval BEFORE taking the course, there was no way for licensees to retroactively apply for approval for the courses they had taken. Their continuing education hours were denied outright. We believe in many cases that the hours would have been approved by the board if the licensee had been able to make application for approval. In essence, we believe many licensees have unnecessarily been penalized over the years for a paperwork error that is easily rectified.

Section 47.37

We find this section confusing. It appears the former 47.37 has been divided in to (a) and (b) and that the listing of (1)-(6) from that section is what appears under (b), but believe that could be made clearer in this proposal.

We support the addition of 47.37(7); however, it may need clarification because pre-approved providers or courses approved by approved approving organizations will not have an approval number assigned to the course or program.

Thank you for your consideration of these comments and we look forward to continuing to work with you on these regulations.

Sincerely,



Rebecca S. Myers, LSW
Executive Director

Cc: The Honorable Tommy Tomlinson
The Honorable Lisa Boscola
The Honorable Tom Gannon
The Honorable William Rieger
Chairman McGinley, Independent Regulatory Review Commission
Beth Michlovitz

Original: 2479



RECEIVED

2005 JUN 30 AM 8:54

REVIEW COMMISSION

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE BOARD OF SOCIAL WORKERS, MARRIAGE AND
FAMILY THERAPISTS AND PROFESSIONAL COUNSELORS**

Post Office Box 2649
Harrisburg, Pennsylvania 17105-2649
(717) 783-2454

June 24, 2005

The Honorable John R. McGinley, Jr., Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
14th Floor, Harrisstown 2, 333 Market Street
Harrisburg, Pennsylvania 17101

Re: Proposed Regulation
State Board of Social Workers, Marriage and
Family Therapists and Professional Counselors
16A-6912: Continuing Education

Dear Chairman McGinley:

Pursuant to section 5(c) of the Regulatory Review Act, 71 P.S. § 745.5(c), enclosed are copies of written comments received by the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors regarding regulation 16A-6912.

Sincerely,

A handwritten signature in black ink that reads "Ronald E. Hays".

Ronald E. Hays, Chairperson
State Board of Social Workers, Marriage and
Family Therapists and Professional Counselors

REH/BSM/law
Enclosure

cc: Joyce McKeever, Deputy Chief Counsel
Department of State
Sandra Matter, Board Administrator
State Board of Social Workers, Marriage and
Family Therapists and Professional Counselors



Fresenius Medical Care

May 19, 2005

Ms. Sandra Matter
Administrative Assistant
State Board of Social Workers
Marriage and Family Therapists and
Professional Counselors
P.O. Box 2649
Harrisburg, PA 17105-2649

RE: *Penna. Bulletin* Ref# 16A-6912

Dear Ms. Matter:

I am writing to protest the deletion of the entire section allowing individual social workers to apply for credit. I believe this section should be retained and individuals should be able to seek board approval for a CEU event at any time rather than the current practice of needing to apply prior to attendance.

I recently attended a conference sponsored by the Penn State Continuing Education at Hershey which unfortunately necessitated my applying to the board for approval on my own. Since this was both germane to my employment but also afforded me proximity to my home and less travel time, I readily applied to the board for approval of same.

I strongly object to the deletion of this privilege. To gain CEU's necessary for licensure should not be rendered a difficult task by the board.

Sincerely,

Paul E. Gombola
Licensed Social Worker

MAY 23 2005

Copy: file

John R. McGinley, Jr.

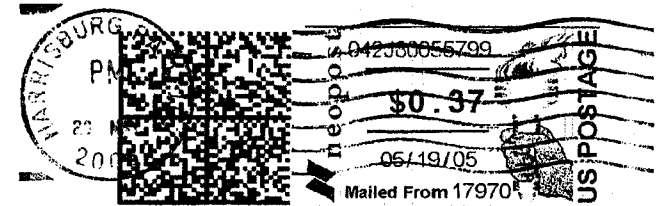


Fresenius Medical Care
Dialysis Services
BMA of Pottsville
278 Industrial Park Road, P.O. Box 128
St. Clair, PA 17970-1186


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MAY 26 2005

DOS LEGAL COUNSEL



*Ms. Sandra Matter
Admin Assistant
State Board of Social Workers etc
P.O. Box 2049
Harrisburg PA 17105-2049*

17105-2049 



...the power of social work

National Association of Social Workers

2005 JUN -2 AM 9:37

May 31, 2005

State Board of Social Workers, Marriage and Family Therapists and Professional Counselors
c/o Sandra Matter, Administrative Assistant
PO Box 2649
Harrisburg PA 17105-2649

Dear Members of the Board:

Thank you for your work on the proposed rulemaking of continuing education regulations as published in the April 30th Pennsylvania Bulletin. NASW-PA, based upon our review of the regulations, believes the regulations balance the Board's charge to protect the public while also meeting the needs of the regulated community. Although the regulations are balanced for the most part, we do have a few questions and comments that are outlined below.

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We make this request based on the number of social workers who have paid fines for not meeting the continuing education requirements. In most cases, these licensees did in fact receive more than the required continuing education hours and received them from highly reputable sources, however, those sources were not deemed "approved" in Pennsylvania, and because Section 47.36(c) required licensees to apply for approval BEFORE taking the course, there was no way for licensees to retroactively apply for approval for the courses they had taken. Their continuing education hours were denied outright. We believe in many cases that the hours would have been approved by the board if the licensee had been able to make application for approval. In essence, we believe many licensees have unnecessarily been penalized over the years for a paperwork error that is easily rectified.

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We support the addition of 47.37(7); however, it may need clarification because pre-approved providers or courses approved by approved approving organizations will not have an approval number assigned to the course or program.

Thank you for your consideration of these comments and we look forward to continuing to work with you on these regulations.

Sincerely,

Rebecca Myers

Rebecca S. Myers, LSW
Executive Director

Cc: The Honorable Tommy Tomlinson
The Honorable Lisa Boscola
The Honorable Tom Gannon
The Honorable William Rieger
Chairman McGinley, Independent Regulatory Review Commission
Beth Michlovitz



Original: 2479



Capital Associates, Inc.

RECEIVED
2005 JUN -2 AM 9:37

REVENUE COMMISSION

Facsimile Cover Sheet

To: Sandra Matter	From: BETH ZAMPOGNA
Fax: 717-787-7769	Pages (inc. cover page): 4
Phone:	Date: May 31, 2005
Re: Continuing Education Regulations	CC:

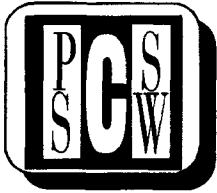
Urgent For Review Please Comment Please Reply Per Your Request

**This Fax Transmission contains CONFIDENTIAL information.
Please call the number listed below if you receive this fax in error.**

Comments:

Please see this letter to members of the Board – the original is being sent in the mail to you!

Original: 2479



**PENNSYLVANIA SOCIETY FOR
CLINICAL SOCIAL WORK**

112 CAROL LANE
RICHBORO, PA 18954
215/942-0775

800/429-7579 (OUTSIDE 215 AND 610 AREA CODES)
EMAIL - PSCSW@AOL.COM WEBSITE: WWW.PSCSW.ORG



May 30, 2005

Sandra Matter, Administrative Assistant
State Board of Social Workers, Marriage and Family
Therapists and Professional Counselors
PO Box 2649
Harrisburg, PA 17105

Dear Members of the Board,

As President of PSCSW, I want to thank you for all of the work you have done to move the LCSW Regulations towards completion. We appreciate your attention to our questions, concerns and suggestions.

Re Regulation #16A-6912 (#2479) Continuing Education, we have several corrections and comments:

A correction: The Clinical Social Work Federation is mentioned in three places [47.36(a) (6). This will be eliminated, but the name of the organization is incorrect]

47.36(a) (5)(ii). The CSWF is correctly identified here.

47.36(a) (6)(iv). The name is incorrectly stated—the organization is the CSWF as

stated above.

Comments:

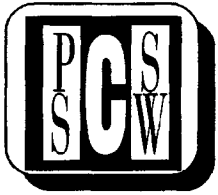
We support the requirement for 30 continuing education hours per biennial renewal period with 3 hours focused on Ethical issues. We do however think that 20 hours in home study courses is excessive. We understand that many social workers in PA are residing in rural areas with difficulty accessing continuing education, but think that 15 hours for home study (half of the total hours required) would be a more reasonable amount. There is a significant factor in having this education in an interactive environment and want to encourage this format.

We support the clear articulation of what must be included on the certificate of attendance and hope that this will help to avoid some of the problems that have arisen when programs were not properly approved for credit.

We continue to support the standards for courses and programs and the inclusion of compliance with Federal, State and Local laws pertaining to disabilities.

We support the inclusion of additional organizations as providers and/or approvers of continuing education. However, we do have some concerns as to how

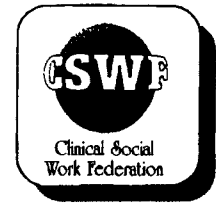
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MAY 31 PM 12:57
STATE BOARD OF SOCIAL WORKERS



**PENNSYLVANIA SOCIETY FOR
CLINICAL SOCIAL WORK**

112 CAROL LANE
RICHBORO, PA 18954
215/942-0775

800/429-7579 (OUTSIDE 215 AND 610 AREA CODES)
EMAIL - PSCSW@AOL.COM WEBSITE: WWW.PSCSW.ORG



an evaluation will be made as to the relevancy for a LCSW of, for example, a program offered by the CRCC or the ADTA.

Re 47.36(c) which has been removed from the Regulations. We think it is very important that individuals be able to get approval for programs that may not be provided or approved by one of the pre-approved providers/approvers. There are conferences that may be out of the area that have something valuable to offer and individuals should be able to get credit for attending. We also strongly believe, as stated previously, that individuals should be able to apply for continuing education credit after attending a program as there are times when one has a last minute opportunity to attend a program and it may not have an approval before hand. Individuals should get credit and not be penalized when they have attended a valuable educational program that meets the stated requirements.

RE 47.37. This is confusing and we are not sure what is being required.

Sincerely,

Diane M. Frankel MSS, LCSW, BCD
President

IRRC

From: Diane M. Frankel [dfrankel@brynmawr.edu]
Sent: Tuesday, May 31, 2005 11:48 AM
To: IRRC
Subject: Comments on Cont Educ Regs from PSCSW



Cont EDuc Regs ltr
5-05.doc

John R. Mc Ginley, Jr
Chairman IRRC

Attached are the comments from PSCSW.

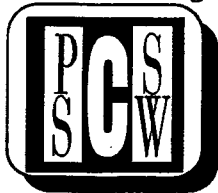
Thank you for your attention to this e-mail.

Diane Frankel
President of PSCSW

--
Diane M. Frankel
dfrankel@brynmawr.edu

RECEIVED
MAY 31 PM 12:57
OFFICE OF THE SECRETARY
STATE OF PENNSYLVANIA

Original: 2479 PENNSYLVANIA SOCIETY FOR



CLINICAL SOCIAL WORK

112 CAROL LANE
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EMAIL - PSCSW@AOL.COM WEBSITE: WWW.PSCSW.ORG



May 30, 2005

Sandra Matter, Administrative Assistant
State Board of Social Workers, Marriage and Family
Therapists and Professional Counselors
PO Box 2649
Harrisburg, PA 17105

Dear Members of the Board,

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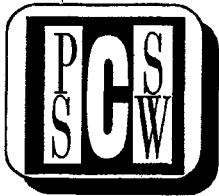
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2005 JUN 1 - 2 AM 9:37



**PENNSYLVANIA SOCIETY FOR
CLINICAL SOCIAL WORK**

112 CAROL LANE
RICHBORO, PA 18954
215/942-0775

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EMAIL - PSCSW@AOL.COM WEBSITE: WWW.PSCSW.ORG



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Sincerely,

Diane M. Frankel MSS, LCSW, BCD
President

Matter, Sandra

From: Diane M. Frankel [dfrankel@brynmawr.edu]
Sent: Tuesday, May 31, 2005 11:58 AM
To: st-socialwork@state.pa.us
Subject: Comments on LCSW regs from PSCSW



Cont EDuc Regs ltr
5-05.doc

Sandra Matter, Attached are the comments on the Regs prepared by PSCSW. Thank you for your attention to these comments.

Diane M Frankel, MSS, LCSW, BCD
President of PSCSW

--
Diane M. Frankel
dfrankel@brynmawr.edu

2005 JUN -2 AM 9:37
MAIL ROOM



Original: 2479

**PENNSYLVANIA ALLIANCE
OF COUNSELING PROFESSIONALS**

550 Pinetown Rd., Suite 301A, Ft. Washington, PA 19034
215-646-3892 Email: pamftpacp@aol.com

2005 JUN -1 AM 9: 08

RECEIVED

May 26, 2005

Sandra Matter, Administrative Assistant
State Board of Social Workers, Marriage and Family Therapists,
and Professional Counselors
P.O. Box 2649
Harrisburg, PA 17105-2649

Dear Ms. Matter:

Subject: Proposed Continuing Education Regulations #16A-6912 (#2479)

The Pennsylvania Alliance of Counseling Professionals (PACP) is pleased to see the approval process for the continuing education regulations moving forward. The Board has provided a good multidisciplinary approach to continuing education that maintains high professional standards and yet allows some flexibility for licensees. Our prior concerns have been addressed and we have only a few, largely editorial, comments.

1. The **Chapter 47** heading does not clearly indicate the profession to which it applies. "LICENSURE OF SOCIAL WORKERS AND CLINICAL SOCIAL WORKERS" needs to be added.
2. **Section 47.36(a)**, **Section 48.36(a)**, and **Section 49.36(a)** include graduate programs accredited by the Council on Social Work Education and the Commission on Accreditation for Marriage and Family Therapy Education (COAMFTE). They do not include the comparable accreditation body for professional counselors. We recommend the addition of: *Graduate programs accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP).*"
3. In **Section 48.37(a)(3)**, publications should be relating to the practice of marriage and family therapy" rather than social work or clinical social work. The same is true in **Section 49.37(a)(3)**, where the reference should be to "professional counseling."

4. It is our understanding that the Board sometimes grants time extensions for completing continuing education requirements rather than just waiving the requirement or exempting an individual from completing the required hours. **Sections 47.40, 48.40, and 49.40** do not seem to include this possibility. We would recommend the inclusion of time extensions when individuals are experiencing a demonstrated hardship but have still been able to practice at least part time during most of a renewal period.

We urge adoption of the proposed regulations with these minor changes. We would also like to thank the Board for a job well done.

Sincerely,



Sally J. Tice, Ph.D., LMFT
PACP President

ST/sm

cc: Independent Regulatory Review Commission
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee
National Association of Social Workers – Pennsylvania Chapter
Pennsylvania Society for Clinical Social Work



Original: 2479

**PENNSYLVANIA ALLIANCE
OF COUNSELING PROFESSIONALS**

550 Pinetown Rd., Suite 301A, Ft. Washington, PA 19034
215-646-3892 Email: pamftpacp@aol.com

RECEIVED
2005 JUN -2 AM 9:37

REVIEW COMMISSION

May 26, 2005

Sandra Matter, Administrative Assistant
State Board of Social Workers, Marriage and Family Therapists,
and Professional Counselors

P.O. Box 2649
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3. In **Section 48.37(a)(3)**, publications should be relating to the practice of marriage and family therapy" rather than social work or clinical social work. The same is true in **Section 49.37(a)(3)**, where the reference should be to "professional counseling."

4. It is our understanding that the Board sometimes grants time extensions for completing continuing education requirements rather than just waiving the requirement or exempting an individual from completing the required hours. **Sections 47.40, 48.40, and 49.40** do not seem to include this possibility. We would recommend the inclusion of time extensions when individuals are experiencing a demonstrated hardship but have still been able to practice at least part time during most of a renewal period.

We urge adoption of the proposed regulations with these minor changes. We would also like to thank the Board for a job well done.

Sincerely,



Sally J. Tice, Ph.D., LMFT
PACP President

ST/sm

cc: Independent Regulatory Review Commission
Senate Consumer Protection and Professional Licensure Committee
House Professional Licensure Committee
National Association of Social Workers – Pennsylvania Chapter
Pennsylvania Society for Clinical Social Work

Original: 2479

IRRC

From: pehoughton@blazenet.net
Sent: Friday, May 20, 2005 10:17 AM
To: IRRC
Subject: CEU Approval

To Whom it may concern,

I would like to add my comments regarding prior approval for credits pertaining to continuing education credits. Often times a conference will state that they have applied for approval for credits but it is not confirmed until after the conference. Also, there are numerous workshops presented all over the commonwealth that are pertinent to our areas of practice, but the presenter finds it too time consuming to submit for approval or they do not receive the approval to add to their brochures. Many presenters do not wish to get involved in the red tape and simply forego applying for approval. I have often attended training's and workshops that are not credited but are invaluable in my work.

I would highly recommend that we be allowed to attain approval even after an event has occurred.

Thank you,
Paulette Houghton
Executive Director
UCP of South Central PA, Inc

RECEIVED
MAY 20 11:18 AM
COMMUNICATIONS SECTION

Original: 2479

Andrea Katin, M.S.W., J.D

215.836.1954 telephone/fax

The Lodge
1407 Bethlehem Pike
Flourtown, PA 19031

Delaware County Office
1029 North Providence Road
Media, PA 19063

RECEIVED
JULY 20 AM 11:16
DELAWARE COUNTY

May 20, 2005

Re: Proposed Regulation #16A-6912(2479)

Sandra Matter, Administrative Assistant
State Board of Social Workers and Family Therapists
And Professional Counselors
P.O. Box 2649
Harrisburg, PA 17105-2549

To Whom It May Concern:

Thank you for the opportunity to comment about the proposed rulemaking regarding Continuing Education for social workers. I am a licensed clinical social worker. I am making these comments in my capacity as a Board member of the Philadelphia Center for Psychoanalytic Education. My role with this Board includes handling all continuing education applications to the Pennsylvania social work board.

Our volunteer organization serves the metropolitan Philadelphia area and has been in existence for twelve years. Our exclusive purpose is to sponsor longer, continuing education courses for psychologists, social workers and professional counselors who are interested in a psychoanalytic perspective. We organize and facilitate about six such courses a year. They usually meet for four weeks and are conducted by prominent local clinicians or authors in the fields of clinical psychology and clinical social work from the United States and Europe.

In the course of this experience, we have run into some recurrent difficulties that could be addressed by modifications of the Board's rules:

(One). What would be most helpful is if the deadline for a sponsor to submit an application were reduced from ninety days to sixty days. While basic information and the objectives of the course are decided upon well in advance, this is not true with respect to the information needed for the detailed outline the Social work Board requires. It is not until closer to the date of the course that the facilitators select exactly which readings and which aspects of the subject will be covered at a particular session or how the topic of a full day workshop will be broken down hour by hour.

(Two). We would appreciate the Board's creating a process whereby more organizations could become pre-approved providers. This seems especially reasonable for an organization such as ours, which is pre-approved for continuing education credits by the

American Psychological Association, which has social workers on its Board and where social workers constitute many of our course participants.

(Three). We would like to recommend making technical changes that would eliminate the hand-written form and allow sponsors as well as participants to apply for continuing education, course approval on-line.

Thank you for your consideration of these ideas. I am available to answer any questions about these suggestions or about other aspects of our experience handling the continuing education credit applications.

Sincerely yours,

Andrea Katin, M.S.W., J.D.

cc: John R. McGinley, Jr., Chairman IIRC

Original: 2479

IRRC

From: pinkydog@juno.com
Sent: Friday, May 20, 2005 8:28 AM
To: IRRC
Subject: Proposed continuing education rulemaking



social work
board.doc

Attached is a copy of a comment letter sent to the State Board and cc'd to you.
Thank you.
Andrea Katin

2005 MAY 20 AM 11:16
IRRC

Andrea Katin, M.S.W., J.D.

15.836.1954 telephone/ fax

The Lodge

Delaware County Office

1407 Bethlehem Pike

1029 North Providence Road

Flourtown, PA 19031

Media, PA 19063

May 20, 2005

Re: Proposed Regulation #16A-6912(2479)

Sandra Matter, Administrative Assistant
State Board of Social Workers and Family Therapists
And Professional Counselors
P.O. Box 2649
Harrisburg, PA 17105-2549

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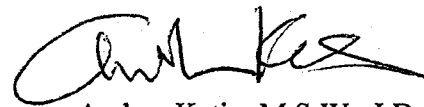
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Thank you for your consideration of these ideas. I am available to answer any questions about these suggestions or about other aspects of our experience handling the continuing education credit applications.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Andrea Katin', written in a cursive style.

Andrea Katin, M.S.W., J.D.

cc: John R. McGinley, Jr., Chairman IIRC

Andrea Katin, M.S.W., J.D.

The Lodge
1407 Bethlehem Pike
Flourtown, PA 19031



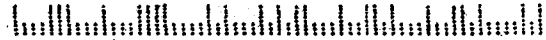
RECEIVED

MAY 26 2005

DOS LEGAL COUNSEL

Sandra Matter, Administrative Assistant
State Board of Social Workers and Family
Therapists
And Professional Counselors
P.O. Box 2649
Harrisburg, PA 17105-2549

17105+2649 26



(11)

Original: 2479

RECEIVED

2005 MAY 24 AM 8:55

REVIEW DIVISION

May 19, 2005

Ms. Sandra Matter
Administrative Assistant
State Board of Social Workers
Marriage and Family Therapists and
Professional Counselors
P.O. Box 2649
Harrisburg, PA 17105-2649

RE: *Penna. Bulletin* Ref# 16A-6912

Dear Ms. Matter:

I am writing to protest the deletion of the entire section allowing individual social workers to apply for credit. I believe this section should be retained and individuals should be able to seek board approval for a CEU event at any time rather than the current practice of needing to apply prior to attendance.

I recently attended a conference sponsored by the Penn State Continuing Education at Hershey which unfortunately necessitated my applying to the board for approval on my own. Since this was both germane to my employment but also afforded me proximity to my home and less travel time, I readily applied to the board for approval of same.

I strongly object to the deletion of this privilege. To gain CEU's necessary for licensure should not be rendered a difficult task by the board.

Sincerely,

Paul E. Gombola
Licensed Social Worker

Copy: file
John R. McGinley, Jr. ✓

IRRC

From: Lisa Mullins [lamlsw@verizon.net]
Sent: Sunday, May 15, 2005 5:36 PM
To: IRRC
Subject: #16A-6912, (#2479)

Hello.

I am a licensed clinical social worker writing to respond to the proposed changes in the continuing education law. Although it appears that many of the changes are positive and will make compliance with the law easier, I was dismayed to see that the section pertaining to individuals applying for approval had been deleted.

As a mother with two young children, I am very careful how I spend time away from my kids. I am passionate about my chosen profession, and it is extremely important to me to improve my skills continually. For this reason, I have been participating in a rigorous and demanding psychoanalytic training program. Unfortunately, the administrators of this program have not yet applied for approval as program providers. They have not done so in part because many of the social workers who attend this program travel from other states to do so. I have been lucky to have been able to get credit for my work in this extensive program through applying for approval as an individual licensee. Although the paperwork burden of this process was not insignificant, I was nevertheless grateful for this option as it limited the additional amount of time I would need to be away from my children in order to accrue the needed hours.

I appreciate you letting me share the particulars of my personal situation, which may help to show the usefulness of the individual licensee clause. I hope it will be retained.

Thank you.

Lisa Mullins, LCSW
340 East Gowen Avenue
Philadelphia, PA 19119
215-248-0560

Original: 2479

IRRC

From: Tasha Adams [adamsinhershey@yahoo.com]
Sent: Sunday, May 15, 2005 2:02 AM
To: IRRC
Subject: Continuing Ed Approval

I feel it would be advantageous, and perhaps reduce the number of practitioners in violation of the current requirement, if approval for CEU's could be applied for after the event as well as before the event is to take place.

Thank you,
Tasha N. Adams, LCSW

Discover Yahoo!
Use Yahoo! to plan a weekend, have fun online & more. [Check it out!](#)

Original: 2479

IRRC

4

From: John Weaver [JWeaver@northamptoncounty.org]
Sent: Tuesday, May 10, 2005 5:54 AM
To: IRRC
Subject: Regulation numbers: #16A-6912, (#2479)



John Weaver.vcf

I am concerned about the proposed changes to the social work licensure process. Please restore the section allowing individuals to apply for continuing education credit. Also, please revise the process to allow individuals to seek board approval for a continuing education events at any time (rather than the current practice of needing to apply PRIOR to attendance). Thank you.

John D. Weaver, LCSW
jweaver@northamptoncounty.org

Northampton County MH/MR/D&A
520 E. Broad Street
Bethlehem, PA 18018-6395

610-974-7508
610-974-7596 (fax)

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PHOTOCOPIED
2005 MAY 10 AM 9:06
REVIEW COMMISSION

6

IRRC

From: Stephanie Costello [stephaniecostello@yahoo.com]
Sent: Monday, May 09, 2005 4:29 PM
To: IRRC
Subject: CEU

I think a social worker who attends a legitimate continuing ed. program sponsored by an organization other than PA Board should have the right to submit this for acceptance within a reasonable amount of time either before or after the event. PA Board's regs. are too restrictive and seem punitive.
Thanks. Stephanie Costello MSW, ACSW, LCSW

Do you Yahoo!?
Yahoo! Mail - Helps protect you from nasty viruses.
http://promotions.yahoo.com/new_mail

RECEIVED
2005 MAY 10 AM 9:06
NEW YORK COMMISSION

5

Original: 2479

IRRC

From: Sam Imler [samimler@atlanticbb.net]
Sent: Monday, May 09, 2005 6:16 PM
To: IRRC
Cc: cindy@nasw-pa.org
Subject: 49Pa Chs 47-49

As a licensed Clinical Social Worker since the inception of the process, I believe in the continuing education. I am currently not employed in the field. I do, however, wish to keep my license. I was able to do so because the board currently permits all thirty(30) of the required hours on-line. This process is much more economical, requires no travel or missed work. The cost of most trainings is in the area of \$150.00 for six hours. I was able to obtain the thirty required hours for under \$300.00. Having attended many trainings over the years, I believe that the quality of the educational experience that I received to be equivalent or to exceed many of the seminars I have attended. Please take this issue under consideration Samuel R Imler ACSW License CW000355L

RECEIVED
2005 MAY 10 AM 9:06
REVIEW COMMISSION

5/10/2005

Original: 2479



IRRC

From: Karen M Lydon [klydon@suscom.net]
Sent: Monday, May 09, 2005 2:02 PM
To: IRRC
Cc: exec@NASW-Pa.org
Subject: Pa SW CE requirements

Dear Pa Board,

I am writing to express my concerns regarding the proposed changes in CE approval for Pa Social Workers.

I am requesting that you retain the clause that allows individuals to apply for CE's as an individual both prior to a workshop and further requesting that you include post conference approval.

There are many high quality presentations both in and out of state which are valuable and relevant to social work practice. Some of these providers are not aware of the length of time and requirements involved in securing CE's for Pa Social Workers and it is an invaluable advantage to be able to apply for them on an individual basis.

Please support Pa social workers and retain this clause as well as extending approval to include a post-conference approval.

Thank you for your consideration.

Karen M Lydon, LCSW, BCD



RECEIVED
2005 MAY -9 PM 2:32
REVIEW COMMISSION