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NASW

PENNSYLVANIA CHAPTER

...the power of social work

National Association of Social Workers

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Executive Director

November 7, 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:

On behalf of the over 6,000 members of the National Association of Social Workers – PA Chapter, I write to inform you of our position on your proposed rulemaking regarding licensure technical amendments as published in the October 8th *Pennsylvania Bulletin*.

Thank you for allowing us to review the draft of these proposed regulation in the spring of 2003 and for considering our responses when developing the proposed rulemaking for publication. NASW-PA supports the technical changes you have made and agrees that the changes will serve to streamline the licensing system for social workers in Pennsylvania.

Concerns regarding Section 47.12a(2) have come to our attention, however, following our comments to you on the draft in 2003. The concern is one raised by PA institutions of higher education in candidacy for accreditation from the Council on Social Work Education for their master's level social work degree programs.

Currently, there are at least two state schools of higher education that have begun the accreditation process which can take 4 – 6 years to complete. Because of the gap between when the first students entering a social work master's degree program in candidacy for accreditation would graduate (between 2 – 3 years) and the final accreditation of the program approved by CSWE (4 – 6 years), it is possible that any students entering social work programs in candidacy 2 years after the effective date of this regulation as proposed by the Board in the revised Section 47.12a(2), would not be eligible to seek licensure for 4 years following their graduation.

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This creates an unfair burden and hardship on the student and, in reality, will serve as a great disincentive to institutions interested in seeking accreditation for new programs due to the difficulty of finding students interested in attending a program that does not make them eligible for licensure upon graduation.

Because of this new knowledge and this true hardship that could be placed on students and schools, NASW-PA requests that the Board revise the regulation to allow a student to become licensed upon graduation from a school in candidacy with the understanding that if the school is not successful in becoming accredited, that the license is thereby revoked.

We believe this type of provision protects the public as well as the student and the school seeking accreditation for its new 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

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