



University of Pittsburgh

Fax Received: 11/7/05

School of Social Work

Child Welfare Education and Research Programs

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November 7, 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

Ref #16A-699

Dear Ms. Matter;

I should like to respond briefly to the notice of proposed rulemaking published in the Pennsylvania Bulletin by the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors on October 8, 2005. As you know, for some time I have advocated changes in the areas of proposed rulemaking. My comments are in two areas.

First, I applaud the Board for correcting the defect in the current regulations which has permitted many unqualified persons to obtain licenses as social workers on the basis that schools of social work were accredited rather than programs. This correction is long overdue, and the proposed language seems to accomplish the desired end.

The second comment I have concerns Section 47.12(a). It is true that when accreditation is granted to programs it is retroactive to a specified date in candidacy. The length of time the school requires to become accredited is not a function of the complexity or technicality of the accreditation process, but of the rate at which the program is able to meet the accreditation standards. To protect the public, no one should be eligible to apply for or receive a license who studies, were in a program which could not meet accreditation standards.

The proposed amendment to 47.12(a)(a)(2) goes beyond what is needed; would make Pennsylvania the only state in the nation to allow such persons to qualify for a license; and poses a threat to public safety. The amendment should include the first proposed sentence to the effect "that beginning two years after the effective date of this amendment, an applicant for licensure must have received a master's degree in social work or social welfare from a program which was an accredited program on the date the degree was awarded or a doctoral degree in social work." (sic.)

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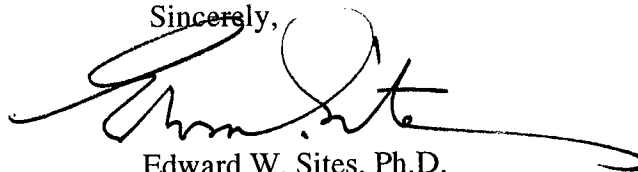
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However, the amendment should NOT include the last proposed sentence to the effect that "students who graduate from social work or social welfare master's degree programs that are in candidacy for accreditation at the time of their graduation may apply for a license once the program obtains accreditation." Since the Council on Social Work Education, the official accrediting body, always specifies an exact effective date; since that date is retroactive at least two years back into candidacy; and since that date is the first date on which the program met accreditation standards and the public can be assured students receive a suitable education; I suggest that the last sentence in the proposed rulemaking be modified. In place of the present sentence I suggest the following: "Students who graduate from social work or social welfare master's degree programs that are in candidacy for accreditation at the time of their graduation may apply for licensure once the program obtains accreditation retroactive to the official date during candidacy on which the accreditation is effective." To simplify the work of the Board, this date is always published. To use any other date would be very difficult to administer and jeopardize the public. No program has ever had any difficulty enrolling students during candidacy under these terms.

Thank you very much for this opportunity to comment. If you have any questions you may call me at 412-624-6305 or email me at esites@pitt.edu.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Sites", with a long horizontal flourish extending to the right.

Edward W. Sites, Ph.D.
Professor

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