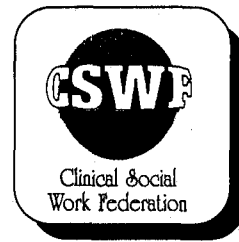


PENNSYLVANIA SOCIETY FOR
CLINICAL SOCIAL WORK

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October 24, 2007

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INDEPENDENT REGULATORY
FEE REVIEW COMMISSION

Beth Michlovitz, Counsel
State Board of Social Workers, Marriage and Family Therapists
And Professional Counselors
PO Box 2649
Harrisburg, Pa 17105-2649

Dear Ms. Michlovitz:

The Pennsylvania Society for Clinical Social Workers [PSCSW] appreciates this opportunity to respond to rulemaking regarding biennial renewal fees.

We also appreciate the very reasonable fees which The Pennsylvania Board of Social Workers, Marriage and Family Therapists, and Professional Counselors has maintained since the beginning. Since the Board expects increased expenses in the next 10 years, it is understandable that it must raise fees.

However, the proposed raise of 67% from \$45 to \$75 in one lump sum is a hefty jump for licensed social workers and clinical social workers who have had their reimbursements cut and anticipate further cuts from Medicare, which is often the model for private insurance plans. Agencies also have kept their starter salaries and even their supervisory salaries at very low rates, making this raise difficult for those agency employed social workers to pay increased fees.

PSCSW respectfully requests the Board to consider a more graduated schedule of fee raises over these next few years so as to reduce the burden on current and new licensed social workers.

Thank you for your time and effort on this matter.

Sincerely yours,

Joan F. Pollak, LCSW, BCD
President PSCSW

Cc: ✓ Arthur Coccodrilli, Chairman, IRR
Kim Kaufman, Executive Director, IRR