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INDEPENDENT REGULATORY REVIEW COMMISSION
333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

November 28, 2007

Michael J. DeStefano, Chairman
State Board of Social Workers, Marriage/Family Therapists and Professional Counselors
2601 North Third Street
Harrisburg, PA 17110

Re: Regulation #16A-6915 (IRRC #2638)
State Board of Social Workers, Marriage/Family Therapists and Professional Counselors
Biennial Renewal Fees

Dear Chairman DeStefano:

Enclosed are the Commission's comments for consideration when you prepare the final version of this regulation. These comments are not a formal approval or disapproval of the regulation. However, they specify the regulatory review criteria that have not been met.

The comments will be available on our website at www.irrc.state.pa.us. If you would like to discuss them, please contact me.

Sincerely,

Kim Kaufman
Executive Director
wbg
Enclosure

cc: Honorable Robert M. Tomlinson, Chairman, Senate Consumer Protection and Professional Licensure Committee
Honorable Lisa M. Boscola, Minority Chairman, Senate Consumer Protection and Professional Licensure Committee
Honorable P. Michael Sturla, Majority Chairman, House Professional Licensure Committee
Honorable William F. Adolph, Jr., Minority Chairman, House Professional Licensure Committee
Honorable Pedro A. Cortes, Secretary, Department of State

Comments of the Independent Regulatory Review Commission

on

State Board of Social Workers, Marriage/Family Therapists and Professional Counselors Regulation #16A-6915 (IRRC #2638)

Biennial Renewal Fees

November 28, 2007

We submit for your consideration the following comments on the proposed rulemaking published in the September 29, 2007 *Pennsylvania Bulletin*. Our comments are based on criteria in Section 5.2 of the Regulatory Review Act (71 P.S. § 745.5b). Section 5.1(a) of the Regulatory Review Act (71 P.S. § 745.5a(a)) directs the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors (Board) to respond to all comments received from us or any other source.

Section 47.4. Licensure fees. – Reasonableness; Fiscal Impact.

Commentators assert that the proposed fee increases will financially burden licensees and request that the fee increases be implemented incrementally to alleviate some of that financial strain. We agree that incremental fee increases could lessen the burden on licensees and recommend that the Board consider implementing the commentators' suggestion.

NOV-28-2007 WED 11:03 AM

FAX NO.

P. 01

Facsimile Cover Sheet

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INDEPENDENT REGULATORY REVIEW COMMISSION
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To: Tom Blackburn
Cynthia Montgomery
Agency: Department of State
Licensing Boards and Commissions
Phone: 3-7200 or 3-3394 (Cynthia)
Fax: 7-0251
Date: November 28, 2007
Pages: 3

Comments: We are submitting the Independent Regulatory Review Commission's comments on the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors' regulation #16A-6915 (IRRC #2638). Upon receipt, please sign below and return to me immediately at our fax number 783-2664. We have sent the original through interdepartmental mail. You should expect delivery in a few days. Thank you.

Accepted by:

Date:

11/28/07