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Executive Director

Gwen Phillips, LCSW  
President

March 5, 2012

Regulatory Unit Counsel  
Department of State  
P. O. Box 2649  
Harrisburg, PA 17105-2649

Dear Regulatory Counsel,

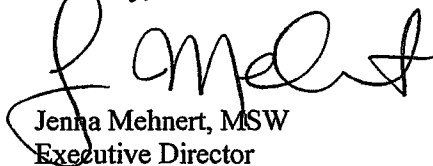
The Pennsylvania Chapter of the National Association of Social Workers (NASW-PA) would like to provide comments in of support Regulation #16A – 4929: Behavior Specialist. We recognize the unique strengths and challenges among children diagnosed on the autism spectrum, as well as the critical importance for professionals to be educated and trained to create treatment plans. Every effort should be made to ensure that children and their families receive quality services from skilled and trained professionals. With that position in mind, NASW-PA is pleased that the administration has submitted these finalized regulations for approval.

NASW-PA has submitted comments several times over the past two years. And, while these regulations do not reflect everything we think they could have included to increase the standard of practice, the only significant concerns remaining are the lack of any requirement for continuing professional education and the absence of any type of ethical standards.

The standard for maintaining licensure in many fields of practice calls for acquiring continuing education credits during a two-year cycle. These credits are intended to encourage professionals to expand their knowledge base and stay up-to-date on new developments. It is NASW-PA's position that this license should include a requirement of 30 continuing education credits to be obtained every two years. Such a requirement would work toward ensuring a competent and current knowledge base among license holders. Many behavioral health rehabilitative services agencies have training infrastructure in place to assure this level of ongoing education.

NASW-PA is also concerned to about the ethical practice of licensed behavior specialist who will not be members of any one single profession, and we would encourage the Board of Medicine to consider attaching ethical standards to this licensure regulation in the near future. That said, we certainly do applaud the administration for investing the time necessary to move these regulations forward to fully enacting Act 62.

Sincerely,



Jenna Mehnert, MSW  
Executive Director  
National Association of Social Workers, PA Chapter

cc: Scott Schalles, Analyst, IRRC