

Jenna Mehnert, MSW  
Executive Director

2831

April 26, 2010

Cynthia K. Montgomery  
Regulatory Counsel  
State Board of Social Workers, Marriage and Family Therapists and Professional Counselors  
P.O. Box 2649  
Harrisburg, PA 17105

Dear Ms. Montgomery,

The Pennsylvania Chapter of the National Association of Social Workers would like to take the opportunity to provide comments on the proposed regulation No. 16A-6916 – Licensure by Endorsement; Hours of Supervised Clinical Experience.

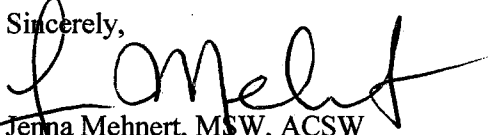
The previous requirement showed that supervised clinical experience shall be completed and that up to 1,800 hours had to be supervised by a LCSW and no more than 1,800 may be accrued in any 12-month period. The proposed regulations decreases the requirement to 1,500 hours supervised by an LCSW, and that no more than 1,500 may be accrued in one year.

NASW-PA has strong concerns for the proposed regulation requesting that only 1,500 hours may be counted for any one year period. Currently, there is a provision for those in the process of accruing their hours that does allow for individuals who have already accrued 1,800 in one year to count all 1,800 hours. Given that an individual working a forty hour week for 50 weeks a year would earn 2,000 hours, we believe it would be more appropriate to leave the cap per year at 1,800 rather than 1,500. As the LCSW credential becomes more recognized and valued, it is critical that social workers be given credit for the work they have accomplished and permitted to count their earned hours.

As many employers now require a LCSW, it creates a financial burden to social workers to reduce the hours that can count in one year. The 1,500 limitation is harmful to LCSW candidates and serves no logical purpose. NASW-PA encourages the board to leave the maximum hours of supervised clinical experience at up to 1,800 in one year. Given that many LSWs have to pay out-of-pocket for supervision, and those relationships remain in effect all year, it is discriminatory not to count all hours appropriately earned.

NASW-PA appreciates the opportunity to provide input on this proposed regulation as it progresses.

Sincerely,

  
Jenna Mehnert, MSW, ACSW  
Executive Director

National Association of Social Workers, PA Chapter