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Cynthia K. Montgomery, Esq.

Regulatory Counsel

Pennsylvania State Board of Social Workers, Marriage and Family

Therapists and Professional Counselors

PO Box 2649

Harrisburg, PA 17105-2649

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April 3, 2013

Letter in Opposition to Biennial Renewal Fee Increase

Ms. Montgomery,

As you know the State Board of Social Workers, Marriage and Family Therapists and Professional Counselors is considering an increase to the fee charged for renewing one's license in Pennsylvania. The proposed increase in biennial renewal fees is from \$75 to \$115; an increase of over 50 percent. This proposal was published in the March 9, 2013 State Bulletin and is now open for public comment. The National Association of Social Workers, Pennsylvania Chapter, wishes to make its opposition to such an increase known for the following reasons:

At your presentation on October 16, 2012, before the State Board of Social Workers, Marriage and Family Therapist and Professional Counselors, (herein referred to as the Board), you stated that based on your research thus far, social workers, marriage and family therapists and professional counselors "don't make enough for what you do". This declaration should have given pause to the Board's consideration of any fee increase, especially given these difficult economical times. Moreover, the proposed rulemaking for the fee increase clearly states that the individual licensees will bear the majority of the fiscal impact of the increase. For these already underpaid licensees, any increase to the cost of licensure will be financially detrimental.

Additionally, in a state where licensure is not mandatory for social workers, many already view licensing as unnecessary. Higher fees will serve to further dissuade scores of social workers from obtaining a license while discourage current licensees from renewing. Since the Board's mission is to protect the public from the unprofessional, improper, unauthorized and unqualified practice of social work, dissuading licensure runs contrary to that purpose. The Board can only monitor those who are licensed, and a fee increase would multiply the number of social workers outside

the reach of the Board's laws and regulations. Ultimately, fewer licensees will negatively impact the Board's revenue stream.

Finally, the proposed rulemaking for the fee increase failed to address the financial impact of House Bill 2274. This bill was introduced in 2012 to provide professional licensure boards an additional means of collecting fines, penalties and fees from a licensee who has violated a rule, statute or regulation following a disciplinary proceeding. Although this bill never became law before the end of the legislative session, it should be pursued instead of a fee increase. It is only reasonable and equitable that the State Board's budget should be funded in part by those who create the most expense for the Board through the prosecution of their wrongdoing.

Despite the claim that current revenue projections are not adequate to cover expenses, the proposed rulemaking did not include an analysis of the Board's expenses, and it is unclear whether all expenses are justified. Moreover, the proposed rulemaking fails to explain why the 2008 increase, which was to be sufficient until 2017, failed to meet expectations.

For the above reasons, NASW-PA does not support the proposed increase to the biennial renewal fee. Pennsylvania's social workers need more incentive to obtain a license; NASW-PA feels that this proposal will simply encourage many to forego the licensing process.

Sincerely,



Ronald Simon, LCSW

Executive Director

National Association of Social Workers, Pennsylvania Chapter

Cc: Laura L. Hinds, LSW – Chairperson
Pennsylvania State Board of Social Workers, Marriage and Family Therapists and Professional Counselors

APR 2013