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INDEPENDENT REGULATORY
REVIEW COMMISSION

James H. Andrews, LCSW, BCD
President

Jenna Mehnert, MSW
Executive Director

July 14, 2008

Sandra Matter, Administrative Assistant
State Board of Social Workers, Marriage and
Family Therapist and Professional Counselors
PO Box 2649
Harrisburg, PA 17105-2649

Dear Ms. Matter:

The National Association of Social Workers, Pennsylvania Chapter (NASW-PA) would like to provide the following comments on the proposed regulations No. 16A-6911, Standards of Professional Conduct.

NASW-PA agrees with the need to establish standards of professional practice and conduct for licensed social workers and licensed clinical social workers. Additionally, the consideration of the State Board of the codes of conduct established by the various professional associations and organizations is appreciated.

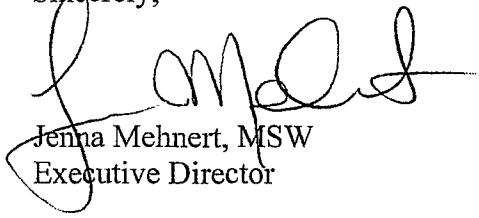
NASW-PA is concerned primarily about the enforcement mechanism and the prosecution of a violation of the code of ethical practice and professional conduct established by the proposed regulations. Currently, presumed or accused violations of the Social Workers, Marriage and Family Therapist and Professional Counselors Act and its accompanying regulations are referred to the division within the Department of State that prosecutes violations of the professions' licensing laws. NASW-PA's understanding of the current process is that attorneys review the complaint and determine if a violation exist to bring to the attention and consideration of the board. We believe this would be a problematic process in instances where accused violations to the ethical practice and professional conduct are reviewed. NASW-PA does not believe it is appropriate for attorneys to review issues and complaints of ethical practice against licensed social workers and licensed clinical social workers when many of these matters are not apparent and often not clear for those not adhering to the same ethical code.

NASW-PA would recommend that violations of this section of the regulations be reviewed by a committee of same licensed professionals who are trained on the code of ethical practice and professional conduct. NASW-PA believes it is not consistent that another profession reviews and makes decisions about whether or not to prosecute and refer to the Board when they are not familiar and do not abide by the same code of ethical practice.

Additionally, as the House Professional Licensure Committee has already outlined numerous inconsistencies in the proposed regulations, NASW-PA would suggest that the Board adopt by reference the current codes of professional conduct for each profession under the Board. In conversations with staff of the House Professional Licensure Committee, NASW-PA was informed that other professions refer to their professional association's code of ethical conduct for these purposes.

Thank you for the ability of NASW-PA to submit comments on these draft regulations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jenna Mehnert', written in a cursive style. The signature is positioned above the printed name and title.

Jenna Mehnert, MSW
Executive Director