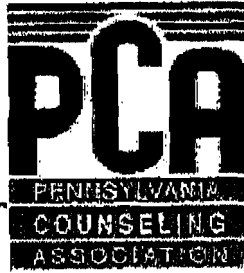


Statements of

Holly Branthoover, Ed.D., LPC, NCC , President- Elect
Pennsylvania Counseling Association

On **HB 2352**
Before the House Professional Licensure Committee
August 5, 2008
Pittsburgh, PA





July 30, 2008

Good morning Chairman Sturla and members of the House Professional Licensure Committee. My name is Dr. Holly Branthoover and I am the President-Elect of the Pennsylvania Counseling Association (PCA). I am a faculty member in the counselor education department at the Indiana State University of Pennsylvania, hold a license as a Professional Counselor in Pennsylvania, am a National Certified Counselor, and a Certified School Counselor. My testimony here today represents concerns of the 561 members of PCA regarding House Bill 2352 which seeks to establish and license the discipline of social service worker. Although PCA does not speak for the more that 3,400 Licensed Professional Counselors in Pennsylvania, we believe we speak on behalf of their interests.

The Pennsylvania Counseling Association appreciates the opportunity to offer testimony on this important issue and wishes to express its opposition to this bill. Our opposition to this bill encompasses three areas: proposed need, licensing preparation, and intent of this bill.

Need. The licensure of Professional Counselors, Marriage and Family Therapists, and Social Workers came after a long period of debate and consideration. The major legislative intent of Act 136 was to protect the public from "unprofessional, improper, unauthorized and unqualified" counseling practitioners. Act 136 clearly suggested that legislation was necessary to offer protection for individuals who sought counseling services in the private sector but the need for such protection did not extend to public services supported by the Commonwealth or any political subdivision of the Commonwealth. In essence, the Legislature considered existing facility licensing provisions tied to public funding streams sufficient to protect the public against improper services provided in public sector or community-based organizations.

It is irresponsible to entrust somebody without a graduate degree to work independently in private or group practice human services positions without ongoing supervision from a supervisor with more advanced credentials. Should that occur, it would not only fail to protect the public safety, but potentially put public safety in jeopardy, undercutting the original intent of Act 136.

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One may tenably assume that candidates for licensure as social service workers will, in fact, be employed in community-services agencies which are customarily funded through public sources and licensed by some state governmental entity. Noting this then raises the fundamental question as to the need for a professional license for individuals working in a licensed agency where the activities of the agency are already regulated and the individuals working in those agencies are not required to be licensed.

Licensing Preparation. The scope of services relative to the licensed social services worker also needs to be examined. The foundation of these services seems to be anchored in "Social Work Theory" at the exclusion of other theoretical approaches. What about undergraduate degrees in human services, human development, rehabilitation services, or psychology? Certainly individuals graduating from these programs may be equally qualified to assume positions in community services described in this proposed legislation. There is no evidence to suggest that this single theoretical approach is any more or less beneficial in enhancing the social or psychosocial functioning of individuals, couples, families or groups. Such an approach, does however, advance a political and economic agenda for the social work industry.

An added concern related to this scope of services would be whether someone with an undergraduate degree would be adequately prepared to carry out the listed functions. Undergraduate curricula require coursework in many areas with only a portion being devoted to work in a particular major. Because someone is exposed to a concept in a course or reads about a concept in the chapter of a book cannot be considered adequate preparation to sufficiently address workplace issues. This is why graduate education has been promoted as a minimum criterion for professional recognition in the human services. Graduate education simply provides a concentration of learning activities that permits a more in-depth understanding of philosophical and practical issues relative to a professional discipline as well as extensive supervised field experience wherein the level of responsibility increases over time. This exposure simply does not exist at the undergraduate level and cannot be assumed to be met by supervision.

Intent. The stated intent of this proposed legislation also needs to be challenged. This legislation would have minimal, if any, impact on public safety since agencies responsible for the scope of services described for the social service workers are primarily public agencies which would fall under the regulations of the Commonwealth. Again, such agencies are immune from requiring licensure of employees. Without a substantial public safety issue, this bill must be considered as a vehicle to advance a single professional discipline.

The scope of practice of social services workers lies well within the realm of other professional groups. Counselors preparing for professional licensure are exposed to and often participate in these same activities. In addition to Licensed Professional Counselors, other groups such as certified school counselors, master's level Certified Addictions Counselors, Master Addictions Counselors, and Rehabilitation Counselors might also possess the skills and abilities necessary to provide supervision in the event the legislature were to consider this bill meaningful. This proposed legislation seems to negate the existence of some other professional groups simply to embellish the field of

Social Work as a single discipline that should be recognized for these activities. It also seems quite apparent that the Social Worker leadership in Pennsylvania continues to marginalize Professional Counselors since this proposed legislation does not recognize the supervisory capacity of LPCs, who are indeed included under the auspices of Act 136.

To suggest that bachelor-level individuals have the skills and abilities necessary to be recognized as licensed professionals in the human services diminishes the professional status of other disciplines. Professional status in the human services should be restricted to individuals who complete specific graduate studies and receive supervision for an extended period of time by other licensed professionals.

Noting the absence of any clear evidence that the public would be safer or better served, it is the opinion of PCA that this attempt to license bachelor-level social service workers and having the license predicated on social work theory simply advances the discipline of social work and therefore represents biased and discriminatory legislation. Certainly the exclusion of LPCs from the list of disciplines recognized as qualified supervisors supports this opinion.

Concerns about the quality of human services made available to the public led the Legislature to establish licensing criteria for professional groups which clearly recognized the need for graduate education as one of the fundamental criteria. The licensing of bachelor-level social service workers clearly seems to be a step backwards in promoting quality human social services in the Commonwealth. Thus, the Pennsylvania Counseling Association stands opposed to this proposed legislation.

Respectfully Submitted,



Dr. Holly Branthoover, LPC, NCC
PCA President-Elect