

**Submitted Testimony of  
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House Professional Licensure Committee Hearing on HB 2352  
October 24, 2008 – Drexel University**

Thank you for providing the opportunity for the Pennsylvania Counseling Association (PCA) to offer testimony on HB 2352. Please note that we offered testimony on this bill in August, 2008 and outlined several concerns. Since August, we have participated in two working sessions with the attorney for this committee and parties who have an interest in this bill. PCA remains opposed to this legislation.

This amended bill continues to be presented as “public safety” legislation which is not the case. Pennsylvania currently has title law protection which excludes agencies of the Commonwealth from being required to hire licensed professionals. Since bachelor-level human services workers would be employed primarily in public agencies (rather than private practice) that receive public funding and are therefore exempt from the requirement to hire licensed professionals, the protection of the public through this legislation becomes a moot issue.

You will likely be presented with information regarding the compelling trend, nationwide, to license bachelor-level social workers. Information about this trend was presented in our last working session by NASW-PA. While the information does show licensure of bachelor-level social workers, it should be noted that all but one state, Alaska, have either practice acts or practice/title acts. This is a critical distinction since Pennsylvania currently has title act legislation in place.

The information also reflects that five states have certifications and one has a registry. We have presented an option for certification of bachelor-level human services workers as a responsible alternative to licensure. We believe, under current title act legislation, that certification has the potential to produce the same outcomes as licensure.

Through our meetings we were able to come to a consensus regarding Board configuration that would maintain a balanced Board. However, we were not in agreement that social worker preparation at the bachelor-level was superior to preparation in other disciplines. We believe it is more practical and equitable to require specific curricular experiences that relate to the activities described in the scope of practice rather than show preference toward one particular discipline.

In conclusion, this legislation is only warranted if the title law regulating Social Workers, Marriage and Family Therapists, and Professional Counselors is amended to become a practice act requiring all human services agencies in the state to hire licensed personnel. Until that occurs, current regulations or a certification of bachelor-level human services workers seems most appropriate.