

**WEST VIRGINIA
SECRETARY OF STATE
JOE MANCHIN, III
ADMINISTRATIVE LAW DIVISION**

Form #3 ■

Do Not Mark In This Box

FILED

2001 JUL 24 A 9:51

OFFICE WEST VIRGINIA
SECRETARY OF STATE

**NOTICE OF AGENCY APPROVAL OF A PROPOSED RULE
AND
FILING WITH THE LEGISLATIVE RULE-MAKING REVIEW COMMITTEE**

AGENCY: WV BOARD OF SOCIAL WORK EXAMINERS TITLE NUMBER: 25

CITE AUTHORITY: 30-1-6.(c); 30-30-3.(e)(1)(4); 30-30-11

AMENDMENT TO AN EXISTING RULE: YES NO

IF YES, SERIES NUMBER OF RULE BEING AMENDED: _____

TITLE OF RULE BEING AMENDED: _____

IF NO, SERIES NUMBER OF RULE BEING PROPOSED: 3

TITLE OF RULE BEING PROPOSED: Fee Schedule

THE ABOVE PROPOSED LEGISLATIVE RULE HAVING GONETO A PUBLIC HEARING OR A PUBLIC COMMENT PERIOD IS HEREBY APPROVED BY THE PROMULGATING AGENCY FOR FILING WITH THE SECRETARY OF STATE AND THE LEGISLATIVE RULE-MAKING REVIEW COMMITTEE FOR THEIR REVIEW.



Authorized Signature

\$8.00

QUESTIONNAIRE

(Please include a copy of this form with each filing of your rule: Notice of Public Hearing or Comment Period; Proposed Rule, and if needed, Emergency and Modified Rule.)

DATE: JULY 24, 2001

TO: LEGISLATIVE RULE-MAKING REVIEW COMMITTEE

FROM: (Agency Name, Address & Phone No.) WV Board of Social Work Examiners

PO Box 5459-Charleston, WV 25361 State Capitol Complex-Main Bldg-Room WB-9

Phone: 558-8816 Fax: 558-4189 Email: williju@mail.wvnet.edu

LEGISLATIVE RULE TITLE: Fee Schedule

1. Authorizing statute(s) citation: West Virginia Code 30-30-1-6.(c); 30-30-3.(e)(1)(4);
and 30-30-11

2. a. Date filed in State Register with Notice of Hearing or Public Comment Period:
June 21, 2001

b. What other notice, including advertising, did you give of the hearing?
Notices were sent to Social Work Agencies; Certified, Clinical, and Graduate social workers to share with supervisees, colleagues, and other interest or affected parties.
Notice was sent to all social work colleges/universities to share with social work students; request was made to post on WV Chapter National Association of Social Workers web site and over one thousand notices were sent to entry level social workers.

c. Date of Public Hearing(s) or Public Comment Period ended:
12:00 p.m. July 21, 2001

d. Attach list of persons who appeared at hearing, comments received, amendments, reasons for amendments.

Attached X No comments received _____

- e. Date you filed in State Register the agency approved proposed Legislative Rule following public hearing: (be exact)

July 24 2001

- f. **Name, title, address and phone/fax/e-mail numbers** of agency person(s) to receive all *written correspondence* regarding this rule: (Please type)

Judith K. Williams, Director

Board of Social Work Examiners - PO Box 5459 - Charleston, WV 25361
State Capitol Main Bldg Room WB9 Charleston, WV 25361

Phone: 558-8816 Fax: 558-4189 Email: williju@mail.wvnet.edu

- g. **IF DIFFERENT FROM ITEM 'f'**, please give **Name, title, address and phone number(s)** of agency person(s) who wrote and/or has responsibility for the contents of this rule: (Please type)

The Board approved the action to propose legislation by formal motion and is responsible for the content of the proposed rule. The Director is the keeper of records and operates the agency at the will and pleasure of the Board and will be available to represent the Board in this matter.

3. If the statute under which you promulgated the submitted rules requires certain findings and determinations to be made as a condition precedent to their promulgation:

- a. Give the date upon which you filed in the State Register a notice of the time and place of a hearing for the taking of evidence and a general description of the issues to be decided.

b. Date of hearing or comment period:

c. On what date did you file in the State Register the findings and determinations required together with the reasons therefor?

d. Attach findings and determinations and reasons:

Attached

SUMMARY OF PROPOSED RULE
SERIES 3-WV BOARD OF SOCIAL WORK EXAMINERS

FEE SCHEDULE

The Board of Social Work Examiners is proposing that a separate rule regarding fees for licensing be submitted. This section was included in the original Legislative Rule. The rule being proposed includes the provision of a fee increase for biennial and renewed licenses of twenty (\$20) dollars over a two-year period. The Board has not requested a substantial fee since July 1993.

A license is issued for two full years and is renewable every two years there after. There are no changes in other fee areas and the language remains the same as well as the fee schedule for other services.

STATEMENT OF CIRCUMSTANCES

PROPOSED RULE

TITLE 25-SERIES 3 FEE SCHEDULE

The Board proposes a separate rule for the fee schedule that was previously included in our Title 25-Series 1 Legislative Rule. With this rule we are requesting a fee increase in initial license, license renewal, and late fees. Licenses are issued for a two-year period and renewable every two years.

The Board has not requested a substantial fee increase since 1993. Our expenditures have increased by over 55% steadily during the last eight years. The most urgent need is to be able to *fund a special investigator* to research complaints, conduct interviews, gather evidence, and offer their findings to the Board for resolution. Our anticipated expenditures during the current fiscal year project that our operating cash balance as of June 30, 2002 may be less than \$15,000. We rely on this account balance amount to carry us into the following fiscal year and do not realize any sizeable income until the January renewal process is in full swing.

We anticipate having to update *computer equipment* and/or software and are in the planning stages of *creating a website*.

A fee increase is necessary in order for the Board to be able to meet the rising costs of agency operation, have the financial resources to contract with a special complaint investigator, and address the needs of the professional and general public.

□
APPENDIX B

FISCAL NOTE FOR PROPOSED RULES

Rule Title: Fee Schedule

Type of Rule: X Legislative _____ Interpretive _____ Procedural

Agency: WV Board of Social Work Examiners

Address: PO Box 5459

Charleston, WV 25369 (physical address: Capitol Complex-Bldg 1-Room WB9)

Contact Person: Judy Williams, Director: williju@mail.wvnet.edu

Telephone: 558-8816 Fax: 558-4189

1. Effect of Proposed rule:

	ANNUAL FISCAL YEAR				
	INCREASE	DECREASE	CURRENT	NEXT	THEREAFTER
ESTIMATED TOTAL COST	40,000		-0-	15,000	25,000
PERSONAL SERVICES	5,000		-0-	2,500	2,500
CURRENT EXPENSE	27,000		-0-	10,000	17,000
REPAIRS & ALTERATIONS	-0-		-0-	-0-	-0-
EQUIPMENT	5,000		-0-	2,000	3,000
OTHER	3,000		-0-	1,500	1,500

2. Explanation of Above Estimates: Increase in annual renewal fee will not affect those who are renewing their license this January 2002 until January 2004. The greater increase is expected to occur in 2004. Expenditures are expected to continue to increase as well. However, the additional income should provide the necessary funds to pay for a special investigator and meet rising costs.
3. Objectives of These Rules: Meet expenditures/hire a special investigator to research complaints and provide findings of fact to the Board/create a website and update computer equipment and software.

Rule Title: Fee Schedule

4. Explanation of Overall Economic Impact of Proposed Rule:

A. Economic Impact on State Government: Expect no impact on State Government

B. Economic Impact on Political Subdivisions; Specific Industries; Specific Groups of Citizens: Social Workers will pay an additional \$20.00 every two years to obtain and maintain their professional social work license.

C. Economic Impact on Citizens/Public at Large. No impact is expected or warranted by this proposal.

Date: June 19, 2001

Signature of Agency Head or Authorized Representative:

Kate M. Brown/Chair

**TITLE 25
LEGISLATIVE RULE
BOARD OF SOCIAL WORK EXAMINERS**

**SERIES 3
FEE SCHEDULE**

FILED

2001 JUL 24 A 9: 50

OFFICE WEST VIRGINIA
SECRETARY OF STATE

§25-3-1. General.

1.1. Scope. -- This rule specifies the fees required for licensing as a social worker, certification as a continuing education, and fees for other services provided by the Board.

1.2. Authority. -- W. Va. Code §§30- 1- 6.(c), §§30-30-3.(e)(1)(4), §§30-30-11.

1.3. Filing Date. --

1.4. Effective Date. --

§25-3-2. Fee Schedule.

2.1 Fees paid to the Board are not refundable.

2.1.1. All fees, with the exception of those for examination, are payable to the West Virginia Board of Social Work Examiners (WVBSWE).

2.1.2. The fee for the late payment of any required fee is thirty dollars (\$30) in addition to the amount of the required fee. The Board applies a late payment fee when a payment is more than thirty-days (30) delinquent, based on the date of receipt of an application, expiration date of a license or permit, or other recognizable date of transaction.

2.1.3. The fee for a payment made by a check returned due to insufficient funds, denial of a credit card charge or similar failure to negotiate payment is the lesser of twenty-dollars (\$25) or the actual amount charged to the Board for the transaction by its designated agent.

2.2. License fees.

2.2.1. The fee for issuance of initial biennial license certificate is seventy-five dollars (\$75).

2.2.2 The fee for biennial license renewal is sixty-five dollars (\$65).

2.2.3 The fee for a social work permit is thirty dollars (\$30.00).

2.2.4. The fee for a temporary license is seventy-five dollars (\$75).

2.2.5. The fee for a replacement license due to loss or name change request is twenty-five dollars (\$25.00).

2.2.6. The fee for biennial renewal of an emeritus status license is

forty dollars (\$40).

2.2.7. The fee for activation of a biennial inactive status license is seventy-five dollars (\$75).

2.2.8. The fee for upgrade to a higher level of license is fifty-five dollars (\$55).

2.3. Examination fees.

2.3.1. The fee for the examination required by the Board is established by and payable to the Association of Social Work Boards (ASWB) or its designee.

2.4 Application fees.

2.4.1. The application fee to become a certified provider of continuing social work education is one hundred dollars (\$100.00).

2.4.2. The application fee to become an individually approved provider of continuing social work education is thirty dollars (\$30.00) for each program application.

2.4.3. The fee to specially monitor the continuing education records and activities of an individually approved provider for the purpose of quality assurance is twenty-five dollars (\$25.00) for one event in each biennial and fifty dollars (\$50) for more than one event in each biennial.

2.5. Fees for certified providers of continuing education.

2.5.1. The fee to re-certify as a certified provider of continuing education is one hundred dollars (\$100)

(a). A certified provider who does not pay the fee to re-certify within thirty (30) days of notice from the Board of certified provider status expiration shall forfeit all rights and privileges as a certified provider of continuing education as defined by the Board.

(b). A certified provider who does not complete a recording form provided by the board for the purpose of determining eligibility for re-certification as a certified provider of continuing education shall not be re-certified, regardless of fee payment status, until a satisfactory determination of eligibility to re-certify has been made by the Board or its designee.

2.5.2. The fee to specially monitor the continuing education records and activities of a certified provider for the purpose of quality assurance is twenty-five dollars (\$25.00) for one event in each biennial and fifty dollars (\$50) for more than one event in each biennial.

2.6. Other fees.

2.6.1. The fee for complying with a request for public information, such as for print or electronic information or data relating to the Board, its members, services, or licensed social workers is calculated based upon the actual cost of materials, employee time, and procedures required to comply with the request.

(a). No fees shall be applied for compliance with initial requests for routine information regarding license application, continuation or renewal processes, or for the Board's annual report.

(b). Requests for additional or bulk quantities may require payment of a fee.

Detail of comments and responses received regarding: Proposed Fee Schedule

Janet Peck, LICSW: Positive response to fee increase with indications that she does not approve of licensing for individuals who do not have a social work degree. The temporary license issue is not being addressed within this rule but the Board appreciates her supportive position regarding the fee increase.

Samuel Hickman, LCSW: Expresses full support of fee increase on behalf of the National Association of Social Workers. Writer agrees that the Board does require additional income to effectively address the public's interest, especially in the area of adjudication of complaints of unethical behavior. (This statement specifically addresses the need to contract with a qualified professional investigator).

Susan Sobkoviak, LSW: Supports a fee increase by stating she feels the Board is "justified" in seeking an increase.

Kenneth Smith, LSW: Acknowledges the Board for their "good work" and supports the proposal to increase fees.

Tom Scarpellini, MA, Probation Officer (Grandfathered LSW): He does not agree to any increase because *salaries are so poor* for social workers. **Response is Attached:** Mr. Scarpellini would not be affected by this increase until January 2003 and is not practicing social work and does not have to maintain a social work license. He has the option to place his license in Inactive Status at no cost if the increase is an issue. He took offense at the lateness in receiving the "Notice of Comment." As we explained to him, a second mailing was done to make sure we covered persons that hold a license but do not work for a social work employer. Notices were sent to all Social Work employers. Mr. Scarpellini is a probation officer with the Court system.

Sharon Daugherty, LSW, Medical Social Worker: Ms. Daugherty offered very kind and positive comments and commended the Board staff on our "good work." She has major concerns about the Board's need to hire a professional investigator to research complaints and strongly agrees that this is an urgent need.

Robert E. Baughman, LSW (Grandfathered): States a twenty-dollar increase would be a burden. Complains that **social workers salaries** are near "the lowest in the United States." **Response is attached:** Our fees, even with the increase, are among the lowest in the United States. He states that, in his opinion, the increase would "outweigh any minimal pay increase that social workers presently endure." **Response:** The increase represents **an additional ten dollars (\$10.00) per year for a two-year license renewal.** If the gentleman is not granted an increase that equals or exceeds ten dollars a year, he may want to address this with his employer. He states that the Board promised that fees would never increase from \$25.00 (initial renewal fee imposed in the 1980's). No such promise was ever made and we find it unrealistic that any agency, organization, or business could make such promises.

He states that we will not be able to attract social work students and that our fee structure is the reason temporary licensed social workers drop out. **Social Work Students have been informed by their colleges** that they would pay a fee for the initial two-year license and we have received no objections thus far. Temporary licensed social workers historically rarely stay in social work in WV and are not eligible for licensing in other states but their dropping out has nothing to do with licensing fees. They can, in many situations, perform the same work in another state where licensing for their particular position is not required by that state. Most states exempt government social workers and several other groups from license requirements.

Sandra Burton, LSW (Grandfathered): Board response is attached: Opposes the increase in renewal fees but supports the "late fee" increase. She further understands our need to meet financial obligations but hopes there may be an alternative rather than increased fees. **Response:** There are no alternatives other than a licensing fee increase. No one enjoys paying a higher price for anything, however, increases in everything is inevitable and constant.

Randy Ruth Blehschmidt, LSW (Grandfathered): Board response is attached: States she understands but sites poor salaries of social workers. Suggests that employers should pay for license fees. **Board response is attached:** Again, we cannot control the salaries of social workers. We appreciate her understanding of our situation and remind the writer that she will not personally be affected until January 2004. This allows her in excess of two years to prepare to pay an additional \$20 for renewal of her professional license.

Marjorie Gandee Stearns, LSW, Emeritus Status: States she maintains her license as a "status symbol" and not an employment credential and should not be subject to a fee increase as is imposed on other licensees. **Response:** The special Emeritus status license privilege is available to licensees that have worked twenty years or more in the profession and have retired from full-time social work practice. These individuals may continue to work in any other field or may practice social work up to twenty hours per week. They are exempt from continuing education requirements in an effort to ease any financial burden. We currently have forty-nine (49) emeritus status licensees, many of which do continue to serve in supervisory positions or work as independent contractors for an agency, organization, or court system. We would consider the feelings of the members of the legislators in this request. We would ask that the legislators note that all emeritus licenses received a notice to comment and no other negative responses have been received. The price for an emeritus license renewal since the inception in 1993 has been \$20.00 for a two-year renewed license. Ms. Stearns would not be affected by the increase until January 2003.

Margaret Longwell, LSW: Offered a very positive comment. We appreciate the kind statement and are certain that the writer realizes the financial needs behind the proposed legislation.

RECEIVED JUN 29 2001

JUNE 28, 2001

RE: INCREASE IN LICENSURE FEES

I DO NOT OPPOSE THE PROPOSED LICENSURE FEE INCREASE.

I DO NOT APPROVE OF TEMPORARY OR PROVISIONAL SOCIAL WORK LICENSURE OF INDIVIDUALS WHO DO NOT HAVE A SOCIAL WORK DEGREE, AND I WOULD BE WILLING TO PAY A HIGHER RENEWAL FEE IF IT WOULD HELP MAINTAIN THE INTEGRITY OF OUR PROFESSION.

JANET Z. PECK, LICSW
WV LICENSE DP00138871

A handwritten signature in black ink, appearing to read "Janet Z. Peck", written over the typed name and license number.



N A S W

National Association of Social Workers

1808 Virginia Street, East
Charleston, West Virginia 25311
TEL. (304) 345-NASW (6279)
FAX (304) 343-3295
E-MAIL: NASWWV@aol.com

WEST VIRGINIA CHAPTER

July 16, 2001

West Virginia Board of Social Work Examiners
PO Box 5459
Charleston, WV 25361

To Whom It May Concern:

The purpose of this letter is to express our association's full support for the legislative rule changes regarding fees for licensure now being proposed by the West Virginia Board of Social Work Examiners.

The Board has not sought fee increases of any kind for some years, while the costs of its operations have risen dramatically. To remain an effective guardian of the public's interests, especially in the area of adjudication of complaints of malpractice or unethical behavior, the Board does require additional income.

Our support for the proposed rule change is limited to the area of fee increases. We would strongly oppose any measures that would seek to alter other provisions of the existing rule.

Thank your for giving us this opportunity to comment on the proposed rule.

Sincerely,



Samuel A. Hickman, ACSW, LCSW
Executive Director

cc: State Senator Mike Ross
Delegate Virginia Mahan

RECEIVED JUN 28 2001

1608 Virginia Street, East
Charleston, West Virginia 25311
TEL. (304) 345-NASW (6279)
FAX (304) 343-3295
E-MAIL: NASWW@aol.com

NASW

National Association of Social Workers

WEST VIRGINIA CHAPTER

Rule Proposal
WV Board of Social Work Examiners
PO Box 5459
Charleston, WV 25361

June 26, 2001

To Whom It May Concern:

This letter is in response to the proposed rule change (Title 25, Series 3) regarding licensing fees. As a licensed social worker, I am in support of the fee increase. Although no one likes to pay additional fees, I do feel the Board is justified in seeking an increase. The Board of Social Work Examiners has experienced a 55% increase in expenditures over the last eight years and has not increased fees since 1993.

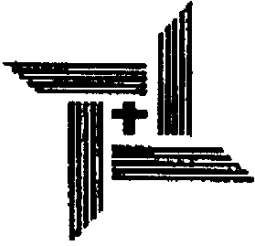
While I do support a fee increase, I do not support any other changes to the social work licensing rule. The social work profession has worked very hard in establishing the standards set forth in the rule.

Thank you.

 BSSW, LSW

Susan Sobkoviak, BSSW LSW
Government Relations Director

Cc: Senator Mike Ross
Delegate Virginia Mahan



Catholic Community Services

Eastern Region

~~3200 North Market Street~~ • Romney, WV 26757 • (304) 822-5414 • FAX (304) 822-7822
EIK PLACE,

Martinsburg Office (304)267-8837 e-mail address: ccse@HardyNet.com

FAX COVER SHEET

Date: 7-17-01

To: BSWE

(304) 558-4189

From: Kenneth Smith (AP00940340)

of pages 1 (including cover sheet)

Message: I support your proposal to increase
licensing fees AS indicated to be
effective July 1, 2002. Thank you for
your good work.

Kenneth M. Smith

Berkeley
Grant
Hardy
Jefferson
Hampshire
Mineral
Morgan

Rule Proposal
WV Board of Social Work Examiners
PO Box 5459
Charleston, WV 25361

July 17, 2001

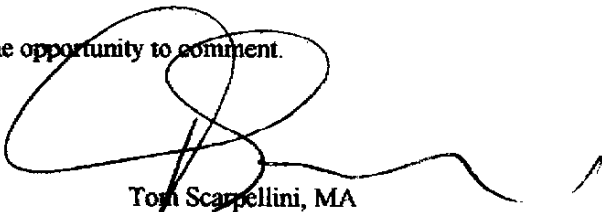
To Whom It May Concern:

I appreciate the chance to comment on the substantial fee increase proposed by the WV Board of Social Work Examiners.

I would first note that I received this notice in today's mail, only four days prior to closing of the comment period and certainly with not enough time to trust mailing it in. It is hard to imagine how anyone could possibly respond appropriately in such a short period of time to such a proposal, prepared in advance.

Secondly I would like to comment on the increase itself. As a probation officer I was grandfathered in to my social work license and though the license is not required for my job I enjoy keeping it active. I feel that the license adds a certain degree of professionalism to my position, a position where I try to install confidence in my clientele. By the nature of social work and most social service related positions, these are not among the highest paid salary positions but instead draw dedicated individuals who wish to make a positive change in society. These dedicated people are the ones being punished by a rate increase. The fact that there has not been a "substantial fee increase since July 1993" is no reason to impose one now. In the past eight years more and more positions have include a social work license as a criteria for employment and certainly the number of social workers practicing in the state has increased adding additional fees to the Board's coffers. Increased fees are also a penalty to positions such as mine which continue to meet Board imposed standards for renewals yet reap no substantial monetary benefit from the license itself. It is my feeling that the Board should do it's best to hold the line on budgetary maters and free those it represents from additional costs.

Thank you for the opportunity to comment.



Tom Scarpellini, MA
115 Morton Drive
Hamlin, WV 25523

West Virginia Board of Social Work Examiners

PO Box 5459 • Charleston, West Virginia 25361 • Phone: (304) 558-8816 • Fax: (304) 558-4189



July 17, 2001

Tom Scarpellini
115 Morton Drive
Hamlin, WV 25523

Dear Mr. Scarpellini,

Thank you for your comments to which we offer the following response. The notice you received is actually a second mailing made in an effort to reach persons outside of social work agencies/organizations. Initially, notices were sent to all social work agencies, social work supervisors, social work colleges, State DHHR offices, and many licensed social workers. It occurred to us that some persons may not be working in a "social work" position that would not be afforded the opportunity to respond or be informed by social work colleagues. This is why we suggested faxing your comments.

Since you are not required to have a social work license to perform the duties of your profession as a probation offer, you do have the privilege of placing your license in "Inactive Status" at no cost. We can appreciate your desire to maintain an active license for the reasons you cited, however, we do want to make sure you understand this option is available to you and taking advantage of this privilege would protect your license and give you the option to reactivate it at any time in the future you deem appropriate.

We fully understand that the need is there to increase the salaries of qualified social workers. At the same time, we cannot take responsibility for, nor do we have any jurisdiction over salaries that are set by the employer. We agree strongly that qualified educated professional social workers certainly should command a salary commensurate with their responsibilities, education, and experience.

Oddly enough, the total number of licensed social workers has not increased very dramatically. This is due to the constant turnover in our profession. In all license categories, many social workers have retired, left to pursue careers in another discipline, relocated to other states, placed their license in inactive status, or simply allowed their license to expire. Our financial records indicate that

Rita Brown, LSW
Chair
Cross Lanes

Brenda Wamsley, LCSW
Vice Chair
Williamstown

Lucy Eates, LSW
Secretary
Fairmont

Mona Dues
Consumer Representative
South Charleston

Jody Gottlieb, LCSW
Huntington

Catherine Jordan, LGSW
Morgantown

Dr. Eric Rankin, LICSW
Morgantown

Judith Williams
Administrative Director

any increase in the number of licensed social workers has not reduced expenditures. I have enclosed a copy of our most recent "Annual Report" that includes several facts including the financial picture.

As to your suggestion to hold the line on budgetary matters we have been doing just that to remain afloat but we have several years ahead to be concerned about and now is the time to put a plan into motion. We would appreciate your support during this process and thank you for your kind attention.

Sincerely,
WV Board of Social Work Examiners
Rita M. Brown, MSW, Chair

Enclosure
Cc: Final Filing Packet

Second Mailing

1001 Colliers Way
Weirton WV 26062
19 July, 2001

Rule Proposal
WV Board of Social Work
Examiners
P O Box 5459
Martinsburg WV 25361

Ladies and Gentlemen:

Please forgive my informal response. I received notice of the comment period in yesterday's mail and want to offer an opinion, but don't have access to a secretary or typewriter at work.

I agree that separation of "tariff schedule" from the rest of the existing rule makes sense as I understand it, and I certainly agree that the fee for licenses and renewals should be increased to permit the BSWE to continue to take care of us, social workers and consumers alike. I can support an increase in fees "just to cover the usual operational expenses, and I would be a fool if I didn't toss in my two cents worth regarding complaint investigation. How can we as a profession not accept the responsibility of policing ourselves — and the cost of that responsibility? I would hope that allegations of whatever nature be investigated thoroughly and by a third-party person or firm, that they be investigated quickly, and that findings be trustworthy. Whether the issue be that says Professional Helper, or the one that says Consumer, employer or Court, we can all be served by having our professional and personal integrity protected by reliable complaint investigation and resolution. So if BSWE needs more funding in order to do that, I gladly support fee increases (and will still consider my license a bargain when I remember all the good work BSWE staff do to keep all of us on track and informed).

Sincerely,

Sharon A. Dayhugh, LSW

154 Stephen St
Wintersville OH
112953

West Virginia Board of Social Work Examiners

PO Box 5459 • Charleston, West Virginia 25361 • Phone: (304) 558-8816 • Fax: (304) 558-4189



July 19, 2001

Sharon Daugherty
154 Stephen Street
Wintersville, OH 43953

Dear Ms. Daugherty,

We appreciate your taking the time to respond to the notice of proposed legislation and particularly for supporting the Board's need for a qualified professional investigator.

We must rely solely on licensing fees to survive financially and to meet the rising costs of daily operation and provide the consumer with the best services and protection available.

It is our strong belief that we have taken every precaution to avoid the prospect of a fee increase, however, after so many years it is inevitable that this would occur eventually. Again, thank you for your support and intelligent comments.

Sincerely,
WV Board of Social Work Examiners
Rita M. Brown, MSW, Chair

Cc: Final Filing Packet

Rita Brown, LSW
Chair
Cross Lanes

Brenda Wamsley, LCSW
Vice Chair
Williamstown

Lucy Eates, LSW
Secretary
Fairmont

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Consumer Representative
South Charleston

Jody Gottlieb, LCSW
Huntington

Catherine Jordan, LGSW
Morgantown

Dr. Eric Rankin, LICSW
Morgantown

Judith Williams
Administrative Director

July 18, 2001


WV Board of Social Workers Examiners
PO Box 5459
Charleston, WV 25361

RE: Comment on Proposed Legislation - "Fee Schedule"

The proposed exuberant fee schedule for licensure would be a burden on current and future Social Workers in the state of West Virginia. The current salaries of Licensed Social Workers and Temporary Licensed Social Workers in West Virginia are near the lowest in the United States. The increase in licensure fees would outweigh any minimal pay increase or the cost of living that social workers presently endure.

The original fee proposal promised that licensing fees would never increase from \$25.00. However, the current licensure fee is \$45.00. Several co-workers have not completed their temporary licensure due to the current fees.

It appears that the proposed substantial fee increase would be detrimental in attracting social work students and in keeping future and present Licensed Social Workers in the state of WV.


Robert E. Baughman, B.A., LSW
License #: AP00452654

West Virginia Board of Social Work Examiners

PO Box 5459 • Charleston, West Virginia 25361 • Phone: (304) 558-8816 • Fax: (304) 558-4189



July 19, 2001

Robert E. Baughman
Rt 3 Box 26F
Philippi, WV 26416

Dear Mr. Baughman,

Rita Brown, LSW
Chair
Cross Lanes

Brenda Wamsley, LCSW
Vice Chair
Williamstown

Lucy Eates, LSW
Secretary
Fairmont

Mona Dues
Consumer Representative
South Charleston

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Huntington

Catherine Jordan, LGSW
Morgantown

Dr. Eric Rankin, LICSW
Morgantown

Judith Williams
Administrative Director

We agree that social workers salaries in West Virginia are among the lowest in the country but at the same time the license fees are among the lowest in the country as well. Unfortunately, the Board has no control over the salary issue.

To the best of our knowledge, and following a review of past legislative proposals, we find no evidence that indicates a promise that licensing fees would "never increase". A.S.I., the organization out of Pittsburgh PA who initially managed West Virginia social work licensing, may have agreed not to increase their contract fees with the Board, however, once the contract ended in 1991 and an office and staff was established, obviously new expenses were created. When the fee increased in 1993, we had hoped that this would suffice for many years and suggested as much. In reality, we feel that stretching our revenue at that rate for nine years, is sufficient proof that we did all we could to avoid further increases. In doing so, we have also done without many things necessary to operate at the maximum level. Despite the increase in fees, having a Board office and staff available in our State seems more important to the majority of social workers, especially those who remember A.S.I. and the many difficulties they encountered.

As far as temporary licensees leaving the state because of the fee structure, we cannot agree to that statement based on the huge mass of records on file in the Board office and daily contact with licensees at all levels. Hundreds of licensees, provisional and regular have left the field and the State, but never once have we been told it is because of our licensing fees. Hundreds have entered the field as well and chose West Virginia as the State they wish to pursue their career in and make their home. Many leave because of the low paying salaries you mention and most often venture into a totally different profession. I'm afraid we cannot resolve the salary issue. We must continue to operate the agency and have the

ability to serve the public as mandated under law. To continue to operate effectively, additional revenue will be required.

In your final statement you state that you feel that our fee would be “detrimental in attracting social work students.” We have shared this information with all West Virginia colleges and universities and have found complete support. If you research other states we think you will find that many states include a non-refundable “application fee” in addition to a fee for the actual license that is usually greater than even our proposed fee.

We appreciate your concerns and respectfully request your support throughout this process. We would be glad to offer you more detailed information upon request.

Sincerely,
WV Board of Social Work Examiners
Rita M. Brown, MSW, Chair

CC: Final Filing Packet

July 19, 2001

WV Board of Social Work Examiners,

Please accept this communication as my official comment on the proposed licensing fee increases. I oppose the increase. The increase will be difficult for those individuals just entering the social work field. In addition it will be difficult for those workers employed by the Department of Health and Human Resources whose salaries still (in most cases) remain less than those of the private sector. Recruitment is always a challenge--and these types of fees create an additional burden.

I have no opposition to the "late fee" increase, due to the fact most often the individual does have control of the situation and should have acted more responsibly.

I do understand the necessity of meeting financial obligations, but would hope there might be other alternatives to explore rather than increased fees.

Thank you.



Sandra Burton
PO Box 124
West Hamlin, WV 25571

***Catholic Community Services
7 - 13th Street
Wheeling, WV 26003***

**FAX TRANSMITTAL FORM
(304) 233-9293**

Date: July 20, 2001

To: Rule Proposal, West Virginia Board of Social Work Examiners

P.O. Box 5459, Charleston, West Virginia 25361

Fax Number: (304) 558 - 4189

Number of Pages: (including cover) 1

From: Randy Ruth Blehschmidt

Regarding: Proposed Fee Increase

Although I understand that the Board is experiencing increased expenditures and I appreciate the work they do on behalf of social workers state-wide, I feel this increase is too high. This is especially true in a State where social workers' averaged wages are very low and most agencies do not cover the cost of renewing licenses.

Please consider these matters in your decisions.

*325 Kenney St
Wheeling 26003*

West Virginia Board of Social Work Examiners

PO Box 5459 • Charleston, West Virginia 25361 • Phone: (304) 558-8816 • Fax: (304) 558-4189



July 20, 2001

Randy Ruth Blehschmidt
325 Kenney Street
Wheeling, WV 26003

Dear Ms. Blehschmidt,

Thank you for your comments and we can assure you that the major concern thus far emphasizes the low salaries of Social Workers in our State. Unfortunately, we have no control over social worker salaries. Maintaining a professional license is costly in any profession and it is rare that an employer will bear the expense for the licensee.

The Board and staff do work diligently to serve the public but we do not have the ability to provide services at the optimum level due to the lack of additional revenue.

Please consider that in your case specifically, you will not be affected by the increase until the year **2004**. Even then, the fee to renew your license will only be increased by \$20.00. By the time you renew your license in January 2004, it will have been eleven (11) years since our Board implemented an increase. This achievement has not been an easy one to meet and we still have many struggles to meet before any revenue increase will be a reality.

We appreciate your kind words and hope you will be supportive in our actions.

Sincerely,
WVBSWE
Rita M. Brown, MSW, Chair

Cc: Final Filing Packet

Rita Brown, LSW
Chair
Cross Lanes

Brenda Wamsley, LCSW
Vice Chair
Williamstown

Lucy Eates, LSW
Secretary
Fairmont

Mona Dues
Consumer Representative
South Charleston

Jody Gottlieb, LCSW
Huntington

Catherine Jordan, LGSW
Morgantown

Dr. Eric Rankin, LICSW
Morgantown

Judith Williams
Administrative Director

RECEIVED JUL 19 2001

To: WV Bd. of Soc. Workers Examiners

I sincerely feel that the "emeritus" license should not be increased, due to the fact most of the holders are retired and do not receive any compensation for being a licensed social worker. It is merely a status symbol and not an employment credential.

We are on a fixed income with many medical expenses, but we take pride in keeping our licenses active.

Please reconsider.

Thank you,

Sincerely,

Marjorie Lande Stearns

AAE 0816484

Second Mailing:

FAX COMMENT TO BSWE: 558-4189 NO LATER THAN JULY 21, 2001

RECEIVED JUL 21 2001

NOTICE OF COMMENT PERIOD
PROPOSED LEGISLATION

LEGISLATIVE RULE CSR-1-25
SERIES 1 AND SERIES 3

WV BOARD OF SOCIAL WORK EXAMINERS

The WV Board of Social Work Examiners proposes that the "fee schedule" section of the existing rule be removed and submitted as a separate rule and that an increase in licensing fees be effective July 1, 2002.

THIS NOTICE OF COMMENT PERIOD SHOULD BE SHARED WITH SOCIAL WORK EMPLOYERS, PERSONS YOU SUPERVISE, COLLEAGUES, SOCIAL WORK STUDENTS, AND ANY OTHER INTERESTED PARTIES.

The board has experienced a 55% increase in expenditures over the last eight years. The proposed fee increase is necessary due to higher costs in all aspects of agency operation. Due to a lack of funds, the board has been unable to secure the services of a professional investigator qualified to investigate complaints. This is a priority issue and an increase in revenue will be required to not only meet rising costs of operation but to meet this most urgent need. ***The Board has not imposed a substantial fee increase since July 1993.***

Proposed Fee Structure

- The fee for a biennial (temporary & regular) license will increase to \$75.00
- The fee for a biennial renewed (temporary & regular) license will increase to \$65.00
- The "late fee" will be increase to \$30.00 for applications received more than thirty days after the expiration date on a license in an effort to discourage late license renewals
- There is no increase in the fee for Social Work Permit, but the applicant will be charged the regular two-year license fee for initial issuance of their first license
- The reactivation fee to reinstate license for two years would be \$75.00
- The "emeritus" license renewal fee will increase to \$40.00 every two-years

With the exception of the late fee increase this proposal represents a twenty (\$20) dollar increase for a two-year social work license.

The board is a non-civil service agency that is supported by licensing fees. An increase in current fees is necessary to meet our financial obligations. You are welcomed to offer your written comments on this proposal.

Please mail your written comments to:

Rule Proposal

WV Board of Social Work Examiners

PO Box 5459

Charleston, WV 25361

**OR FAX TO BSWE: (304) 558-4189

I think you deserve
every penny!

(Peggy) Margaret Longwell

COMMENTS RECEIVED AFTER 12:00 P.M. ON JULY 21, 2001 WILL NOT BE

ACCEPTED

LSW