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Dear Representative Sweaney,

My name is JB Barna and I am on the faculty of the Social Work Department at UVM. I practiced social work at the Howard Center for 10 years prior to becoming a Social Work educator 13 ½ years ago (August, 2000). My current responsibilities at UVM are to work with community agencies and organizations to provide professional field practicums for both our undergraduate and graduate students. Any given year I place about 100 students in year-long (500 – 600) hour internships.

I would like to share some thoughts regarding H656 and the changes the OPR is suggesting regarding Social Work licensure. I have some concerns and questions. I have attended three of the open meetings sponsored by the OPR. I also invited the advisors of the board and the board members, themselves, to a meeting with our full faculty in the Social Work Department. Unfortunately, they did not respond to the invitation. I found that unfortunate. We are the only accredited Masters Program for Social Work in the State and, given that the two licenses being proposed require a masters degree/training it seemed this may have informed their process more fully. I will add that the meetings at the OPR were very well attended by agency social workers and some changes to the initial draft were made based on the comments from the 15 – 20 of us who did attend or who did provide written comments.

I will attempt to be both brief and yet detailed enough that I communicate concerns/questions clearly.

1. Obviously the big change the OPR is suggesting is the introduction of an additional Social Work license. My first concern is that the way it is being introduced and the language being used clearly privileges the therapy license over the masters level license. In other words, the overall impression (if approved) will be that Vermont State Government believes that individual therapy is more difficult and more important than all the other Social Work being carried out in our communities – social work that is not considered 'psychotherapy'. I agree that the work has some differences. I do not agree that one (the LICSW) is more difficult or requires more refined skills. As a matter of fact, I could even argue that the opposite is true – that the work of our community based social workers (the LMSW's), those who are working with individuals, families and groups outside of a therapy setting, those that are doing important community, organizational and policy work, may even require a *more* sophisticated set of skills. I can say with confidence that this was the foundational belief that encompassed the overwhelming majority of comments and concerns heard from the social workers who attended these meetings. I believe this is why the turnout at these meetings were so much higher than the OPR anticipated.

2. The OPR argues that they are not holding the LICSW in higher esteem than the LMSW. The problem is that the way these revisions are written suggests that, indeed, they are. Below are the primary places I believe illustrate my statement.

a. Section 3201.6 The definition of Social Work is so much deeper and broader than this. With the new license, some of what will be considered masters level licensed "work" is not even included in this definition. The definition is very diagnosis focused (LICSW) and does not reflect the scope and breadth of the social work profession. When we raised this with the OPR, they were not interested in making the changes suggested. We even suggested language from the professional texts, themselves - the texts that are written to teach students what social work is.

b. Section 3201.3 and 3201.5 A-D This is the section that defines the work of an LMSW. It adds that people who achieve this license cannot do 'psychotherapy'. And then it goes on to talk about what psychotherapy is – just so folks with this license are clear that they cannot do it. There is nothing in the LICSW definition that describes what work "they cannot do." I find this odd if the licenses are truly just two different licenses with two different sets of tasks.

Additionally, some of what is being described as psychotherapy overlaps with agency work in the community. I really wonder how much this new licensure will impact the work going on in the human service and social service agencies/organizations in our state. I'm wondering if they are going to have employees who wouldn't be eligible to be rostered as doing 'psychotherapy' and therefore will be unable to complete hours toward an LICSW but whose job requires them to do some elements of the work that is being defined as 'psychotherapy'. It feels very confusing and unclear to me and I'm expecting it will to others, as well.

c. Section 3204.a This is the section that relates to the appointment of Advisors to the OPR by the Secretary of State. The language and intention of this section is that both appointed Advisors hold an LICSW's. When we asked why not appoint one LICSW and one LMSW as Advisors, the OPR said that the issues that come up are always around the Licensed Independent Social Workers. Well, perhaps that's because this has been the only license up until now, therefore these would naturally be the only cases they would have heard in the past. The OPR then attempted to make a big case for how much consultation it requires to sort these things out and that they needed more than one LICSW's to help them. We then suggested they appoint two LICSW's and one LMSW. They were not in favor of that and dismissed the idea. I asked who they will be consulting with around the LMSW cases. When the reply was that the LICSW advisors could do that - I feel like we caught them disagreeing with their initial premise. In other words, they essentially were saying that the LICSW advisors can advise on everything that comes across the OPR's desk, including LMSW cases (even though they do not do the work of the LMSW). And then following that statement, they said they didn't believe the LMSW could advise on LICSW cases but didn't really say why. And finally, I'm guessing the role of Advisor is more than hearing cases of misconduct. The Advisors in this case had a significant role in writing the suggested revisions to the statute. In the future, it would be helpful if an LMSW could also sit with the OPR to do this.

d. Section 3205.a.3 Many of us question how it was that a licensed psychologist can supervise an LICSW toward licensure but an LICSW can't supervise a psychologist toward their licensure? This really baffled the group. How could a psychologist know the professional standards, values, and ethics of a profession in which they have no training in or education. Where will the LICSW get that kind of supervision if they choose to go this route?

e. Section 3205.a.C This section talks about how an LMSW can become an LICSW but there is no section that talks about how an LICSW can become an LMSW. I'm afraid that the OPR felt that it is a lesser, less skilled license and therefore, the preferred LICSW automatically gets to be a LMSW.

I truly appreciate your time to read this and I appreciate greatly your service to our state. Thank you very much,

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