



**Lynn Currier Stanley, NASW-VT**  
**OPR Bill Amendment - House Government Operations Committee**  
**February 18, 2025**

Thank you for the opportunity to testify today on the OPR bill. My name is Lynn Currier Stanley. I am a social worker and the executive director for the Vermont Chapter of the National Association of Social Workers (NASW-VT).

I'm pleased to bring to you today two amendments to OPR's bill for your consideration. They include (1) increasing title protection for social workers and (2) the elimination of some confusing language in the statute concerning psychotherapy, which is creating an unnecessary barrier to social worker licensure the hiring of new professionals.

**Social Worker Title Protection**

Social work is a prescribed field of study. It is a profession with its own mission, values, and code of ethics. Social workers share many skills obtained and possessed by other professions. But it is its own field of study that includes work at micro or 'clinical,' mezzo, and macro levels. Social work is a profession. Just because you help people, you do not get to call yourself a social worker. We do not allow people to call themselves nurses, doctors, lawyers, or barbers, unless they have actually graduated from the appropriate educational program. To not fully have these protections diminishes the education, experience, and unique perspective of the social work profession.

Vermont currently has protective title language for social workers in 2 instances

1. "Licensed social worker"
  - no one can call themselves a "licensed social worker" unless they are actually *licensed as a social worker*. A licensed social worker includes both a licensed independent clinical social worker and a licensed master's social worker.
2. State agency social workers
  - *State agencies and its contractors* shall not use the job title 'social worker' for any position unless the person who is hired is actually *a social worker who has graduated from a program accredited by the Council on Social Work Education*.

While these protections are there for licensed social workers and social workers who work for state agencies, they do not extend to social workers who have a Bachelors or Masters degree in Social Work, nor do they extend to private entities who employ people who they call social workers.

We know that, just by looking at job postings on Indeed, there are a number of positions where the job title is social worker, but a Bachelors or Masters degree in social worker is not necessarily required. We are not asking organizations to only hire social workers; we are asking

that organizations not entitle the position “social worker” unless the person is actually a social worker by education.

***Amendment 1:***

26 V.S.A. § 3202. Prohibition; offenses

(a) A person shall not practice or attempt to practice licensed independent clinical social work or licensed master’s social work, nor shall any person use in connection with the person’s name any letters, words, or insignia indicating or implying that the person is a licensed independent clinical social worker or a licensed master’s social worker unless the person is licensed in accordance with this chapter.

**(b) No person shall (1) use the title "social worker" or any initials associated with such title, or (2) advertise services under the description of "social worker", unless such person has earned a bachelor’s, master’s, or doctoral degree from a social work program accredited by the Counsel of Social Work Education.**

(b c) A person who violates any of the provisions of subsections (a) and (b) of this section shall be subject to the penalties provided in 3 V.S.A. § 127.

(c d) A State agency, **or private entity**, or a subdivision or contractor thereof shall not use or permit the use of the title “social worker” other than in relation to an employee holding a bachelor’s, master’s, or doctoral degree **from an accredited school or program of social work a social work program accredited by the Counsel of Social Work Education.**

**“Psychotherapy”**

The second amendment that we are requesting involves removing some of the potentially confusing language around the word “psychotherapy”, and the perceived need to have that word within the job description in order for that position to be used as a pre-licensure job.

Social Work can include psychotherapy, but it is not just psychotherapy. Social workers are trained in a variety of therapeutic modalities and work in a multitude of settings. Social workers do not necessarily work where they are providing one-on-one therapy to clients. Social work is a broad profession and social workers occupy numerous clinical positions and have a variety of job descriptions.

Limiting licensure opportunities to only those positions which have psychotherapy in the job description, as part of the current statute does, *creates a barrier* not seen in other states. This puts Vermont at a disadvantage and pushes social workers out of jobs that need to be filled.

Although the restriction that we are seeking to amend only appears in statute to apply to positions at the Agency of Human Services, it has come to our attention that the way this part of the statute is interpreted by some organizations, including through guidance from OPR in years past, this is being applied to positions beyond AHS. A minor change to the statute would remove

the ambiguity and the barrier to social workers taking positions that do not have the term “psychotherapy” within the job description. They would be able to hold a greater number of potential positions as qualified settings after graduation during those two years of supervised practice before they get their license.

*Amendment 2:*

26 V.S.A. § 3201. Definitions

As used in this chapter:

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(7) “Psychotherapy” means the provision of treatment, diagnosis, evaluation, or counseling services to individuals or groups, for a consideration, for the purpose of alleviating mental disorders.

(A) “Psychotherapy” involves the application of therapeutic techniques to understand unconscious or conscious motivation, resolve emotional, relationship, or attitudinal conflicts, or modify behavior that interferes with effective emotional, social, or mental functioning.

(B) “Psychotherapy” follows a systematic procedure of psychotherapeutic intervention that takes place on a regular basis over a period of time, or, in the case of evaluation and brief psychotherapies, in a single or limited number of interventions.

(C) If a person is employed by or under contract with the Agency of Human Services, this definition does not apply to persons with less than a master’s degree; to persons providing life skills training or instruction, such as learning to make friends, to handle social situations, to do laundry, and to develop community awareness; ~~or to interactions of employees or contracted individuals with clients whose job description or contract specifications do not specifically mention “psychotherapy” as a job responsibility or duty.~~

Thank you for hearing my testimony today and I am very happy to answer any questions you might have.

Respectfully submitted,  
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