

February 6, 2023

Cheryl LeClair
Rhode Island Department of Health
3 Capitol Hill
Providence, RI 02908

RE: Regulation Change Proposal, Clinical Social Workers and Independent Clinical Social Workers Section 7.4.1.C

Dear Cheryl LeClair and the Rhode Island Department of Health:

We offer this testimony **to express our concern regarding** Section 7.4.1.C of the Clinical Social Workers and Independent Clinical Social Workers Regulation. There are two primary reasons we believe the proposed regulation needs to be better articulated or amended: 1) the language is unclear and contradictory and 2) the eighteen month probationary period is too long for social workers to practice without a license.

In the first place, the proposed regulation does not read clearly. It indicates one must have graduated from an accredited MSW program in the introduction but then stipulates in item #3 that the person must still be an intern or a trainee. Those who have graduated with their MSW are no longer in their internship and are therefore not considered social work trainees.

Secondly, we are concerned that this regulation would allow social work graduates to practice as a social worker without a license for 18 months. Licensure is critically important in social work. All of those who have graduated from an accredited school of social work are eligible to receive their LCSW license upon graduation. This past year, we worked to pass legislation to remove the standardized examination at the LCSW level. This action reduced the wait time for social workers to get their license and allows more graduates to become licensed without the barrier of the test. Importantly, social workers who hold the LCSW must meet continuing education requirements, which ensure individuals are being continually trained in professional ethics and cross-cultural practice. Licensure creates accountability for the state and ensures consumer protection.

Social workers should always practice under the standards set for those with a license. The eighteen month period allowed in this regulation is far too long for individuals to be exempt from those standards. NASW-RI urges you to consider these comments and make the appropriate changes to the regulation.

If you have any questions or would like to talk with us about recommended language modifications, please do not hesitate to reach out to our Executive Director, Rebekah Gewirtz. Thank you for your time and consideration.

Sincerely,



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