



Economic Impact Analysis Virginia Department of Planning and Budget

18 VAC 140-20 – Regulations Governing the Practice of Social Work
Department of Health Professions
April 8, 2008

Summary of the Proposed Amendments to Regulation

The Board of Social Work (Board) proposes to amend its regulations to mandate that candidates for licensure sit for a Board approved exam within two years of application approval. The Board also proposes to remove duplicative language from the section of these regulations that govern experience requirements.

Result of Analysis

The benefits likely exceed the costs for all proposed changes.

Estimated Economic Impact

Current regulations specify that applicants for licensure must pass a written examination but do not set a time limit on when this exam must be taken. The Board proposes to amend these regulations to require applicants to take the written exam within two years of the date that their application is approved by the Board. If applicants do not take an exam within two years, these proposed regulations would require them to re-apply and meet whatever licensure requirements are current at the time of the new application.

The Board proposes this amendment to allow Board staff to follow Department of Health Professions' (DHP) policy for record retention. This policy specifies that Boards should retain incomplete applications (including applications that lack proof that the applicant has taken the exam) for a year. This policy allows Boards to vary from this time restraint so long as the variance is in favor of the applicant. The Board also proposes this amendment to avoid situations where long spans of time elapse between an applicant completing the education/experience that prepares him for the exam and taking the exam.

This regulatory change will benefit the Board, which will be able to better manage its record keeping, and may also benefit applicants for licensure if the requirement that they take the exam when the information on which they will be tested is fresh in their mind leads to higher exam passage rates. To the extent that fairly contemporaneous education/experience and testing help insure better client service, the public that is served by licensed clinical social workers and licensed social workers may also benefit from this change. Applicants who do not take the exam within two years will incur another application fee (this fee is currently \$100) and may incur extra costs for obtaining more education/experience if, then current, regulations require it. Although the Board has no firm estimate of the number of applicants for licensure that would be affected, this number is likely to be miniscule. Accordingly, the benefits associated with this regulatory change will likely outweigh the costs.

Businesses and Entities Affected

These regulatory changes will affect all of this Board's applicants for licensure. In 2007, the Board newly licensed 275 licensed clinical social workers and 60 licensed social workers.

Localities Particularly Affected

No locality will be particularly affected by this proposed regulatory action.

Projected Impact on Employment

This regulatory action will likely have no impact on employment in the Commonwealth.

Effects on the Use and Value of Private Property

This regulatory action will likely have no affect on the use or value of private property in the Commonwealth.

Small Businesses: Costs and Other Effects

Small businesses in the Commonwealth are unlikely to incur any costs on account of this regulatory action.

Small Businesses: Alternative Method that Minimizes Adverse Impact

Small businesses in the Commonwealth are unlikely to incur any costs on account of this regulatory action.

Real Estate Development Costs

This regulatory action will likely have no effect on real estate development costs in the Commonwealth.

Legal Mandate

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.H of the Administrative Process Act and Executive Order Number 36 (06). Section 2.2-4007.H requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. Further, if the proposed regulation has adverse effect on small businesses, Section 2.2-4007.H requires that such economic impact analyses include (i) an identification and estimate of the number of small businesses subject to the regulation; (ii) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the regulation, including the type of professional skills necessary for preparing required reports and other documents; (iii) a statement of the probable effect of the regulation on affected small businesses; and (iv) a description of any less intrusive or less costly alternative methods of achieving the purpose of the regulation. The analysis presented above represents DPB's best estimate of these economic impacts.