

## **Agency Response to Economic Impact Analysis**

The Board of Social Work concurs with the Analysis of the Department of Planning and Budget on proposed amended regulations for 18VAC140-20-10 et seq., Regulations Governing the Practice of Social Work with one exception.

On page 3, the EIA states that the prohibition on physical contact with a client when there is a likelihood of psychological harm or sexually harassment of a client would only apply to social workers who are in dual relationships. It would be the opinion of the Board that those behaviors would constitute a “dual relationship” that is inappropriate and unethical and possibly grounds for disciplinary action.