



Virginia Department of Planning and Budget **Economic Impact Analysis**

18 VAC 140-20 Regulations Governing the Practice of Social Work
Department of Health Professions
Town Hall Action/Stage: 6371 / 10511
April 9, 2026

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with § 2.2-4007.04 of the Code of Virginia (Code) and Executive Order 19. The analysis presented below represents DPB's best estimate of the potential economic impacts as of the date of this analysis.¹

Summary of the Proposed Amendments to Regulation

In response to a 2023 petition for rulemaking,² the Board of Social Work (Board) proposes to add American Psychological Association (APA) certified or approved trainings to the list of approved continuing education providers.

Background

Licensed clinical social workers are required to have completed a minimum of 30 contact hours of continuing education, and licensed baccalaureate social workers (LBSWs) and licensed master's social workers (LMSWs) are required to have completed a minimum of 15 contact hours of continuing education prior to licensure renewal in even years. Under the current regulation, a minimum of 20 hours for licensed clinical social workers and a minimum of ten hours for LBSWs and LMSWs must be in Category I. The following qualify as Category I:

¹ Code § 2.2-4007.04 requires that such economic impact analyses determine the public benefits and costs of the proposed amendments. Further the analysis should include but not be limited to: (1) the projected number of businesses or other entities to whom the proposed regulatory action would apply, (2) the identity of any localities and types of businesses or other entities particularly affected, (3) the projected number of persons and employment positions to be affected, (4) the projected costs to affected businesses or entities to implement or comply with the regulation, and (5) the impact on the use and value of private property.

² See <https://townhall.virginia.gov/L/viewpetition.cfm?petitionid=399>.

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- a. Regionally accredited university or college academic courses in a behavioral health discipline. A maximum of 15 hours will be accepted for each academic course.
 - b. Continuing education programs offered by universities or colleges accredited by the Council on Social Work Education.
 - c. Workshops, seminars, conferences, or courses in the behavioral health field offered by federal, state or local social service agencies, public school systems, or licensed health facilities and licensed hospitals.
 - d. Workshops, seminars, conferences, or courses in the behavioral health field offered by an individual or organization that has been certified or approved by one of the following:
 - (1) The Child Welfare League of America and its state and local affiliates.
 - (2) The National Association of Social Workers and its state and local affiliates.
 - (3) The National Association of Black Social Workers and its state and local affiliates.
 - (4) The Family Service Association of America and its state and local affiliates.
 - (5) The Clinical Social Work Association and its state and local affiliates.
 - (6) The Association of Social Work Boards.
 - (7) Any state social work board.

The Board proposes to add “The American Psychological Association” to the list of organizations whose certification or approval qualifies workshops, seminars, conferences, or courses in the behavioral health field to count toward Category I continuing education.

Estimated Benefits and Costs

Since adding APA-certified or approved training to the list of approved continuing education providers for social workers is the result of a petition for rulemaking, there appears to be interest in using such training to satisfy required continuing education contact hours. Thus, those social workers interested in such training and the providers of such training could benefit by newly permitting such training to count toward social worker continuing education contact hours. The providers of APA-certified or approved training could have increased demand for their services and increased revenue. Conversely, to the extent that newly accepting such training would lead to some social workers substituting it for other training they would have taken, the providers of the other training may receive less revenue.

Businesses and Other Entities Affected

The proposed amendments potentially affect the 13,900 licensed clinical social workers 74 LBSWs, and 1,647 LMSWs in the Commonwealth as well as providers of social worker continuing education.³

The Code requires DPB to assess whether an adverse impact may result from the proposed regulation.⁴ An adverse impact is indicated if there is any increase in net cost or reduction in net benefit for any entity, even if the benefits exceed the costs for all entities combined.⁵ As described above, some current providers of social worker continuing education may receive reduced demand for their services and consequently reduced revenue. Thus, an adverse impact is indicated for such continuing education providers.

Small Businesses⁶ Affected:⁷

Types and Estimated Number of Small Businesses Affected

The proposed amendment affects small private providers of continuing education training for social workers. As the Board regulates individual social workers and does not directly regulate these entities, no number of affected small businesses is available.

³ Data as of March 31, 2025. Source:

<https://www.dhp.virginia.gov/about/stats/2026Q3/04CurrentLicenseCountQ3FY2026.pdf>.

⁴ Pursuant to Code § 2.2-4007.04(D): In the event this economic impact analysis reveals that the proposed regulation would have an adverse economic impact on businesses or would impose a significant adverse economic impact on a locality, business, or entity particularly affected, the Department of Planning and Budget shall advise the Joint Commission on Administrative Rules, the House Committee on Appropriations, and the Senate Committee on Finance.

⁵ Statute does not define “adverse impact,” state whether only Virginia entities should be considered, nor indicate whether an adverse impact results from regulatory requirements mandated by legislation. As a result, DPB has adopted a definition of adverse impact that assesses changes in net costs and benefits for each affected Virginia entity that directly results from discretionary changes to the regulation.

⁶ Pursuant to § 2.2-4007.04 of the Code of Virginia, small business is defined as “a business entity, including its affiliates, that (i) is independently owned and operated and (ii) employs fewer than 500 full-time employees or has gross annual sales of less than \$6 million.”

⁷ If the proposed regulatory action may have an adverse effect on small businesses, Code § 2.2-4007.04 requires that such economic impact analyses include: (1) an identification and estimate of the number of small businesses subject to the proposed regulation, (2) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the proposed regulation, including the type of professional skills necessary for preparing required reports and other documents, (3) a statement of the probable effect of the proposed regulation on affected small businesses, and (4) a description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation. Additionally, pursuant to Code § 2.2-4007.1, if there is a finding that a proposed regulation may have an adverse impact on small business, the Joint Commission on Administrative Rules shall be notified.

Costs and Other Effects

As described above, small private providers of APA-certified or approved continuing education may benefit from increased demand for their services and revenue. Conversely, some small private providers of other continuing education for social workers may face reduced demand for their services and revenue.

Alternative Method that Minimizes Adverse Impact

There are no clear alternative methods that both reduce adverse impact and meet the intended policy goals.

Localities⁸ Affected⁹

The proposed amendment neither disproportionately affects any particular locality, nor affects costs for local governments.

Projected Impact on Employment

The proposed amendment is unlikely to substantively affect total employment.

Effects on the Use and Value of Private Property

The proposed amendment may moderately increase the value of private APA-certified or approved continuing education providers and moderately decrease the value of private providers of other continuing education for social workers. The proposed amendment does not affect costs related to the development of real estate.

⁸ “Locality” can refer to either local governments or the locations in the Commonwealth where the activities relevant to the regulatory change are most likely to occur.

⁹ § 2.2-4007.04 defines “particularly affected” as bearing disproportionate material impact.