

Agency Response to Economic Impact Analysis

The Board of Social Work does not concur 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, relating to a fee increase.

The supposition that a change to an annual renewal may result in a slight decrease in revenue is not supported by past experience with budgets of other boards. The Board of Audiology & Speech-Language Pathology changed from biennial to annual renewal in 2004; by 2009 there was a sufficient surplus in revenue to warrant a decrease in renewal fees. The Board of Psychology changed from biennial to annual renewal in 2003; that board has had subsequent reductions in renewal fees in 2007 and again in 2010 because surplus revenue resulted. The Board of Counseling changed from a biennial to annual renewal in 2000 and has been able to adopt a reduction in renewal fees for 2006, 2007 and 2010.

The EIA is also incorrect in the statement that proof of continuing education is required for license renewal; the licensee is required to attest on the electronic renewal form that he is in compliance with continuing education requirements. Only those licensees who are audited every two years are required to provide proof of continuing education.

The agency strongly disagrees with the statement that costs will outweigh benefits of the proposed change because evidence from the experience of other boards points to the opposite conclusion.