

**MEMORANDUM**

**TO:** James Rough, Counselor, Social Worker, and Marriage and Family Therapist Board

**FROM:** Jeffrey R. Kasler

**DATE:** September 14, 2012

**RE:** **CSI Review – Social Worker Licensure**

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On behalf of Lt. Governor Mary Taylor, and pursuant to the authority granted to the Common Sense Initiative (CSI) Office under Ohio Revised Code (ORC) section 107.54, the CSI Office has reviewed the abovementioned administrative rule package and associated Business Impact Analysis (BIA). This memo represents the CSI Office's comments to the Agency as provided for in ORC 107.54.

**Analysis**

The proposed rule package consists of eleven rules. All are subject to five-year review under ORC 119.032, and all or proposed either with no changes or minor clarifications. The regulations are in place to guide the Board in efficiently and effectively carrying out its mission of licensing professional counselors, social workers, and marriage and family therapists in Ohio. The Board must ensure that applicants for licensure meet established statutory requirements and also must maintain oversight of continuing education requirements needed for license renewal.

The initial Business Impact Analysis submitted by the Board failed to describe the Board's plans for two of the proposed rules – OAC 4757-19-07 and 4757-19-08. At the request of the CSI Office, a revised BIA was submitted describing OAC 4757-19-07 as proposing no changes, and OAC 4757-19-08 as making minor changes related to examinations,

**Regulatory Intent**

The proposed rules provide the parameters for licensure for both social workers and independent social workers. The regulations ensure that social workers and independent social workers meet

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all statutory licensure requirements and understand their scope of practice.

### *Development of the Regulation*

The Board sent the rules to all representatives on its Listserv via email. It also sent separate emails to all associations that have expressed an interest in Board issues over the years and, finally, it emailed the rules to all counselor, social worker, and marriage and family therapist education programs offered at Ohio's colleges and universities.

The Board received feedback and made minor changes to the rules in accordance with that feedback. According to its Business Impact Analysis, the Board did not hear any serious level of disagreement with the proposed rules.

### *Adverse Impact*

The regulated community is represented by licensed social workers and their employers.

According to state law, to become a licensed social worker an applicant must pay an application fee, have an acceptable degree, have supervised experience (for the independent social worker license), a criminal records check, and passing scores on a licensure examination. The approximate costs of the aforementioned elements are as follows:

- Licensure fees: \$60 for social workers and \$75 for independent social workers
- Master's degree: \$30,000 to \$80,000, depending on the school
- Licensure examination: \$230 for social workers and \$260 for independent social workers
- Criminal records check: \$46 (\$22 to the Ohio Bureau of Criminal Investigation and \$24 to the Federal Bureau of Investigation)

All of the above costs are, again, associated with licensure requirements defined in statute. As such, the Board is justified in proposing these rules.

### **Recommendations**

The CSI Office has no recommendations regarding this rule package.

### **Conclusion**

Based on its review of the proposed rule package, the CSI Office recommends the Board should proceed in filing the proposed rules with JCARR.