

Michigan Department of Licensing and Regulatory Affairs  
**Office of Regulatory Reinvention**  
611 W. Ottawa Street; 2nd Floor, Ottawa Building  
Lansing, MI 48909  
Phone: (517) 335-8658 FAX: (517) 335-9512

**Agency Report to the  
JOINT COMMITTEE ON ADMINISTRATIVE RULES**

This form must be completed by the department/agency that has the statutory authority for promulgating the rules. Please send an electronic copy of this form to the Office of Regulatory Reinvention at [orr@michigan.gov](mailto:orr@michigan.gov). The ORR will review the document, the newspaper advertisements, and the corresponding rules prior to completing the legal certification of the rules. Please be sure to send to the ORR proofs of publication for the three newspaper advertisements required by MCL 24.242(1). Please send them as a scanned attachment.

**Department:**

Licensing and Regulatory Affairs

**Division/agency/bureau:**

Bureau of Professional Licensing

**Rule set number (as assigned by ORR):**

2014-157 LR

**Title of rules:**

Social Work-General Rules

**1. Name, address, FAX and phone numbers of agency contact person:**

Kerry Ryan Przybylo  
611 W. Ottawa Street, 3<sup>rd</sup> Floor  
P.O. Box 30670  
Lansing, Michigan 48909  
Office: 517-335-6145  
Fax: 517-247-7535

**2. Purpose for the proposed rules and background:**

The Board of Social Work - General Rules have not been revised since the licensure process was first implemented in 2005. The current rules will be rescinded and then provisions from those rules will be re-codified into new rules that will be given new rule numbers and reorganized into logical parts. Additionally, the new rules will conform to statutory requirements, expand continuing education opportunities, and clarify requirements for obtaining a master's social worker license with either a macro or clinical designation.

**3. Summary of proposed rules:**

PART 1: General Provisions

R 338.2921—Definitions. The current rule containing definitions, R 338.2901, is being



rescinded and replaced with this new rule. Many of the definitions in the current rules will not be in the revised rules, as they are either not used in the rules or are duplicative of the statute.

R 338.2923—Educational standards. The current rule for educational standards, R 338.2906, is being rescinded and replaced with this new rule. The new rule adopts by reference the educational standards for social work programs. The references will be updated to reflect current standards.

R 338.2925—Examination adoption. The current rule containing examination by adoption, R 338.2908i, is being rescinded and replaced with this new rule. The new rule adopts the Association of Social Work Boards (ASWB) examinations for bachelor's and master's level social workers.

R 338.2929—Human trafficking training standards. This rule will be added to address the human trafficking training requirements created in 2014 PA 343, MCL 333.16148.

#### PART 2: Social Work Technician Requirements

R 338.2931—Limited social service technician registration requirements. The current rule containing the registration requirements for a limited social service technician, R 338.2907a, is being rescinded and replaced with this new rule. The new rule establishes the limited social service technician registration requirements. This rule will be updated to comply with MCL 333.18507.

R 338.2933—Social service technician registration requirements. The current rule containing the registration requirements for social service technicians, R 338.2907b, is being rescinded and replaced with this new rule. The new rule provides the requirements for a social service technician registration. This rule will now comply with MCL 333.18507.

R 338.2935—Requirements for registration by endorsement. The current rule pertaining to registration or licensure by endorsement, R 338.2908j, is being rescinded and replaced with this new rule. The new rule requires that an applicant's license be verified by the registering agency of all other states of the United States in which the applicant holds a current registration or ever held a registration as a social service technician. If applicable, verification shall include the record of any disciplinary action taken or pending against the applicant.

R 338.2937—Requirements for reregistration of a social service technician. The current rule pertaining to reregistration of a social service technician, R 338.2908k, is being rescinded and replaced with this new rule. The content of the new rule will be the same, but will be updated to include the appropriate statutory citations.

#### PART 3: Bachelor's Social Worker Requirements

R 338.2939—Limited bachelor's social worker requirements. The current rule pertaining to licensure requirements for a limited bachelor's social worker, R 338.2908e, is being rescinded and replaced with this new rule. The new rule updates the definition of an approved agency, in accordance with MCL 333.18501 of the Code.

R 338.2941—Bachelor's social worker license by examination; requirements; graduates of schools in compliance with board standards; limited bachelor's social worker license. This current rule, R 338.2908f, is being rescinded and replaced with this rule. The new rule



conforms to MCL 333.18509, by removing the language providing for alternate supervision. However, the new rule makes the individual supervision requirement less burdensome on the prospective licensee, as the supervision will no longer need to be completed strictly “in person,” but may instead be completed using “live and simultaneous contact.” Additionally, the new rule clarifies that experience in the limited license status may be earned in a volunteer or employment capacity.

R 338.2943—Licensure by endorsement. The current rule pertaining to licensure or registration by endorsement, R 338.2908j, is being rescinded and replaced with this new rule. The new rule addresses licensure by endorsement only and requires that an applicant’s license be verified by the licensing agency of all other states of the United States in which the applicant holds a current license or ever held a license as a social worker. If applicable, verification shall include the record of any disciplinary action taken or pending against the applicant.

R 338.2945—Relicensure of bachelor’s level social worker requirements. The current rule pertaining to relicensure requirements for a bachelor’s or master’s level social worker, R 338.2908l, is being rescinded and replaced with this new rule. Currently, the administrative rules merely require adherence to MCL 333.16201 for applicants seeking relicensure. The new rule creates a tiered system of requirements that vary depending on how long the social worker has had his or her license lapsed. All applicants for relicensure must submit an application and fee and appropriate continuing education. Applicants who have been lapsed for 3 years or longer must complete 1,000 hours of supervised experience under a licensed master’s level social worker, and those who have been lapsed more than 7 years must retake the appropriate examination. Basically, the longer a licensee has been out of practice, the more stringent the requirements will be to gain re-entry to practice. Further, the rule is being revised to add language requiring 5 hours of continuing education in ethics.

#### PART 4 Master’s Social Worker Requirements

R 338.2947—Limited master’s social worker license requirements. The current rule pertaining to licensure requirements for a limited master’s social worker, R 338.2908g, is being rescinded and replaced. The new rule defines when an agency is considered approved by the board, as required by MCL 333.18506.

R 338.2949—Master’s social worker license requirements; generally. The current rule pertaining to a master’s social worker licensure, R 338.2908h, is being rescinded and replaced. This rule will be added to establish the general requirements for both master’s social worker designations. This rule will also clarify that in order to obtain a second master’s designation; the applicant must take the appropriate examination. Additionally, this rule will make the individual supervision requirement less burdensome on the prospective licensee, as the supervision will no longer need to be completed strictly “in person,” but may instead be completed using “live and simultaneous contact”.

R 338.2951—Master’s social worker licensure requirements; macro designation. This rule will be added to address the specific requirements for licensure as a master’s level social worker with a macro designation. The rule will also clarify the necessary experiential requirements for this designation.

R 338.2953—Master’s social worker licensure requirements; clinical designation. This rule will be added to address the specific requirements for licensure as a master’s level social worker with a clinical designation.



R 338.2955—Relicensure of a master's level social worker. The current rule pertaining to relicensure requirements for a master's level social worker, R 338.2908l, is being rescinded and replaced with this new rule. Currently, the administrative rules merely require adherence to MCL 333.16201 for applicants seeking relicensure. The new rule creates a tiered system of requirements that vary depending on how long the social worker has had his or her license lapsed. All applicants for relicensure must submit an application and fee and appropriate continuing education. Applicants who have been lapsed for 3 years or longer must complete 1,000 hours of supervised experience under a licensed master's level social worker and those who have been lapsed more than 7 years must retake the appropriate examination. Basically, the longer a licensee has been out of practice, the more stringent the requirements will be to gain re-entry to practice. Further, the rule is being revised to add language requiring 5 hours of continuing education in ethics.

R 338.2957—Licensure by endorsement for master's social workers. The current rule pertaining to registration or licensure by endorsement, R 338.2908j, is being rescinded and replaced with this new rule. The new rule requires that an applicant's license be verified by the licensing agency of all other states of the United States in which the applicant holds a current license or ever held a license as a social worker. If applicable, verification shall include the record of any disciplinary action taken or pending against the applicant.

#### PART 5 Continuing Education

R 338.2961 license renewals; continuing education requirements. The current rule pertaining to continuing education requirements for license renewals and relicensure, R 338.2908m, is being rescinded and replaced with this new rule. The new rule increases the number of required pain and symptom management credits from 1 to 2 every renewal cycle.

R 338.2963 Acceptable continuing education. The current rule pertaining to acceptable continuing education, R 338.2908n, is being rescinded and replaced with this new rule. The new rule provides documentation requirements in the event a licensee is audited, and expands acceptable continuing education to include academic courses related to the practice of social work offered by an approved educational program.

R 338.2965—Methods of approval for continuing education programs. The current rule pertaining to methods of approval for continuing education programs, R 338.2908o, is being rescinded and replaced. The new rule adopts ASWB standards for co-sponsorship agreements, thereby easing the burden on applicants wishing to provide continuing education. The new rule adds "cultural competence and diversity" to the list of topics that a course or program may address.

**4. Name of newspapers and date of publication in newspapers (minimum 3 newspapers of general circulation, representing different parts of the state, one of which must be located in the Upper Peninsula):**

The Flint Journal: March 8, 2016  
The Grand Rapids Press: March 8, 2016  
The Mining Journal: March 8, 2016



**5. Time, date, location, and duration of public hearing:**

Wednesday, March 23, 2016 from 9:00 a.m. – 11:00 a.m. The hearing was held at the G. Mennen Williams Building Auditorium at 525 W. Ottawa Street, Lansing, Michigan 48909

**6. Date of publication of rules and public hearing notice in *Michigan Register*:**

March 15, 2016, Issue No. 4

**7. Provide the link the agency used to post the regulatory impact statement on its website:**

[http://w3.lara.state.mi.us/orr/AdminCode.aspx?AdminCode=Department&Dpt=LR&Level\\_1=Bureau+of+Professional+Licensing](http://w3.lara.state.mi.us/orr/AdminCode.aspx?AdminCode=Department&Dpt=LR&Level_1=Bureau+of+Professional+Licensing)

**8. Agency representative(s) attending hearing (include agency name and title of representative[s]):**

Michael Siracuse, Karen Carpenter and Kerry Przybylo, Department Analysts, Bureau of Professional Licensing

**9. Persons submitting letters, comments, and testimony of support:**

See attached table.

**10. Persons submitting letters, comments, and testimony of opposition:**

See attached table.

**11. Summary of suggestions to modify proposed rules:**

See attached table.

**Name of person completing this report:**

Kerry Ryan Przybylo

**Date report completed:**

July 8, 2016



STATE OF MICHIGAN )  
County of Genesee

ss *Dawn Suttory*

Being duly sworn deposes and say he/she is Principal Clerk of



## THE FLINT JOURNAL DAILY EDITION

a newspaper published and circulated in the County of Genesee and otherwise qualified according to Supreme Court Rule; and that the annexed notice, taken from said paper, has been duly published in said paper on the following day(day(s))

*March 8* A.D. 20 *16*

Sworn to and subscribed before me this *11th* day of *March* 20 *16*

**Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing  
NOTICE OF PUBLIC HEARING  
WEDNESDAY, MARCH 23, 2016  
9:00am - 11:00am**

Location: G. Mennen Williams Building Auditorium  
525 W. Ottawa Street, Lansing, Michigan

The hearing is held to receive public comments on the following administrative rules:

**Board of Social Work (ORR # 2014-157 LR)**

Authority: MCL 333.16145; MCL 333.16148; MCL 333.18516; and MCL 333.18518

**Overview:** The proposed rules reorganize the Board of Social Work into logical sequence with new rule numbers. The rules expand continuing education opportunities and clarify the requirements for obtaining a license at each designation level. Licensees are required to complete training in identifying victims of human trafficking.

**Board of Medicine (ORR # 2013-114 LR)**

**Board of Osteopathic Medicine and Surgery (ORR #2014-001 LR & 2014-002 LR)**

Authority: MCL 333.16145; MCL 333.16148; MCL 333.16204; MCL 333.16215; MCL 333.17033; MCL 333.17048; MCL 333.17533; and MCL 333.17548.

**Overview:** The rules update the adopted standards to the most recent versions. Other updates include changes to the names of the Bureau and testing entities. The proposed rules reorganize the rules into a logical format. The current osteopathic medicine and surgery continuing education rules, which exist as a separate rule set, are rescinded and incorporated into the continuing education requirements of the Osteopathic Medicine and Surgery's general rules. The continuing education requirements for both the Board of Medicine and Board of Osteopathic Medicine and Surgery expand the types of activities for which continuing education is granted and requires additional continuing education in the area of pain and symptom management. Licensees are required to complete training in identifying victims of human trafficking. The rules also make changes to the delegation requirements for physician assistants and nurse practitioners.

The rules will take effect immediately upon filing with the Secretary of State, unless specified otherwise in the rules. Comments on the proposed rules may be presented in person at the public hearing. Written comments will also be accepted until 5:00 p.m. on March 25, 2016, at the following address or email address:

Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing - Boards and Committees Section  
P.O. Box 30670  
Lansing, MI 48909-8170  
Attention: Policy Analyst Email: BPL-BoardSupport@michigan.gov

A copy of the proposed rules may be obtained by contacting (517) 373-8068 or at the email address noted above. Electronic copies also may be obtained at the following link:

[http://w3.lara.state.mi.us/orr/AdminCode.aspx?AdminCode=Department&Dpt=LR&Level\\_1=Bureau+of+Professional+Licensing](http://w3.lara.state.mi.us/orr/AdminCode.aspx?AdminCode=Department&Dpt=LR&Level_1=Bureau+of+Professional+Licensing)

The meeting site and parking are accessible. Individuals attending the meeting are requested to refrain from using heavily scented personal care products, in order to enhance accessibility for everyone. People with disabilities requiring additional accommodations (such as materials in alternative format) to enter to

*Marietta Foley*

MARIETTA FOLEY  
Notary Public, State of Michigan  
County of Kent  
My Commission Expires: December 23, 2016

**RECEIVED**

**MAR 18 2016**

DEPARTMENT OF LICENSING & REGULATORY AFFAIRS  
BUREAU OF PROFESSIONAL LICENSING  
BOARDS & COMMITTEES SECTION



# The Mining Journal

Upper Michigan's Largest Daily Newspaper

249 W. Washington St., P.O. Box 430, Marquette, Michigan 49855. Phone (906)228-2500. Fax (906)228-3273.

## AFFIDAVIT OF PUBLICATION

STATE OF MICHIGAN

## AFFIDAVIT OF PUBLICATION

For the County of MARQUETTE

In the matter of: Notice of Public Hearing  
Department of Licensing & Regulatory Affairs  
Bureau of Professional Licensing

Size: 3x6

State of MICHIGAN, County of Marquette ss.

**JAMES A. REEVS**

being duly sworn, says that he is

**PUBLISHER**

of **THE MINING JOURNAL**

a newspaper published and circulated in  
said county and otherwise qualified  
according to Supreme Court Rule; that  
annexed hereto is a printed copy of a  
notice which was published in said  
newspaper on the following date, or  
dates, to-wit

March 8, 2016



**JAMES A. REEVS**

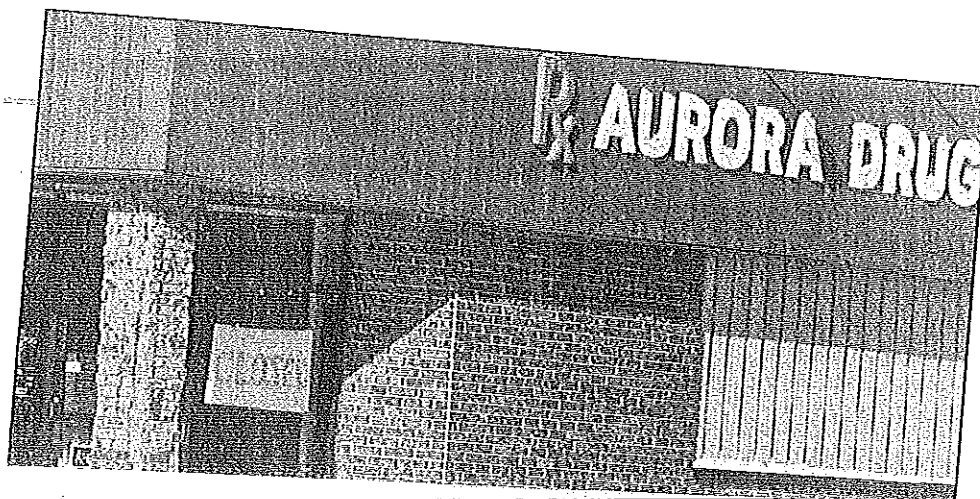
Subscribed and sworn to before me this 8<sup>th</sup> day of March, 2016.



**AMY L. BOND**

Notary Public for Marquette County, Michigan  
Acting in the County of Marquette  
My commission expires: July 3, 2019





Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing  
**NOTICE OF PUBLIC HEARING**

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The rules will take effect immediately upon filing with the Secretary of State, unless specified otherwise in the rules. Comments on the proposed rules may be presented in person at the public hearing. Written comments will also be accepted until 5:00 p.m. on March 25, 2016, at the following address or e-mail address:

Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing— Boards and Committees Section  
P.O. Box 30870  
Lansing, MI 48909-8170  
Attention: Policy Analyst Email: BPL-BoardSupport@michigan.gov

A copy of the proposed rules may be obtained by contacting (517) 373-8068 or at the email address noted above. Electronic copies also may be obtained at the following link:

<http://w3.lara.state.mi.us/orr/AdminCode.aspx>  
AdminCode=Department&Dpt=LR&Level\_1=Bureau+of+Professional+Licensing

The meeting site and parking are accessible. Individuals attending the meeting are requested to refrain from using heavily scented personal care products, in order to enhance accessibility for everyone. People with disabilities requiring additional accommodations (such as materials in alternative format) in order to participate in the meeting should call (517) 241-7500.



MAR 14 2016

DEPARTMENT OF LICENSING & REGULATORY AFFAIRS  
BUREAU OF PROFESSIONAL LICENSING  
BOARDS & COMMITTEES SECTION

RECEIVED

MAR 10 2016

LARA

STATE OF MICHIGAN )

County of Kent  
and County of Ottawa

ss Deja McHerson

Being duly sworn deposes and say he/she is Principal Clerk of



## THE GRAND RAPIDS PRESS

DAILY EDITION

a newspaper published and circulated in the County of Kent and the County of Ottawa and otherwise qualified according to Supreme Court Rule; and that the annexed notice, taken from said paper, has been duly published in said paper on the following day(days)

March 8

A.D. 20 16

Sworn to and subscribed before me this 8 day of March 20 16

Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing  
**NOTICE OF PUBLIC HEARING**  
WEDNESDAY, MARCH 23, 2016  
9:00am - 11:00am

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The rules will take effect immediately upon filing with the Secretary of State, unless specified otherwise in the rules. Comments on the proposed rules may be presented in person at the public hearing. Written comments will also be accepted until 5:00 p.m. on March 25, 2016, at the following address or e-mail address:

Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing- Boards and Committees Section  
P.O. Box 30670  
Lansing, MI 48909-8170  
Attention: Policy Analyst - Email: BPLBoardSupport@michigan.gov

A copy of the proposed rules may be obtained by contacting (517) 373-8068 or at the email address noted above. Electronic copies also may be obtained at the following link:

Marietta Foley

MARIETTA FOLEY  
Notary Public, State of Michigan  
County of Kent  
My Commission Expires: December 23, 2016



STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS

A PUBLIC HEARING was held regarding the Board of Social Work and the Board of Medicine. The hearing was taken at the G. Mennen Williams Building, 525 West Ottawa Street, Lansing, Michigan, at 9:00 a.m. on March 23, 2016.

APPEARANCES:

Michael Siracuse, Analyst for the Bureau of Professional Licensing

Kerry Przybylo, Analyst for the Bureau of Professional Licensing

Karen Carpenter, Analyst for the Bureau of Professional Licensing

Janet Vroman, Court Reporter



## INDEX OF SPEAKERS

Dr. Karen VanDeusen, Professor at Western Michigan  
University in the School of Social Work

Maxine Thome, National Association of Social Workers

Duane Breijak, National Association of Social Workers

Michele Brock, Social Work

Amy Vliek, Director of Admissions at Western Michigan  
University



Lansing, Michigan

Wednesday, March 23, 2016

9:00 a.m.

MR. SIRACUSE: Good morning. My name is Michael Siracuse, and I am an Analyst for the Bureau of Professional Licensing in the Department of Licensing and Regulatory Affairs.

This hearing is being called to order at 9 a.m. on March 23rd, 2016 at the G. Mennen Williams Building Auditorium located at 525 West Ottawa Street, Lansing, Michigan. The hearing is being conducted under the authority of the Administrative Procedures Act, Public Act 306 of 1969. The notice of public hearing was published in the Marquette Mining Journal, the Grand Rapids Press, and the Flint Journal on Tuesday, March 8th, 2016. The same notice was also published in the Michigan Register on March 15, 2016.

As stated in the notice, the Social Work rules are being amended to reorganize the rules into a logical sequence with new rule numbers. Additionally, the draft rules expand continuing education opportunities and clarify the requirements for obtaining a license at each designation level. Licensees will also be required to complete training in identifying victims of human trafficking, as required by MCL 333.16148.



1           As also stated in the notice, the Medicine and  
2 Osteopathic Medicine and Surgery rules are being amended to  
3 update the adopted standards to the most recent versions.  
4 Other updates to these rulesets include changes to the  
5 names of the Bureau and testing entities. The proposed  
6 rules for Medicine and Osteopathic Medicine and Surgery  
7 will also reorganize the rules into a logical format. The  
8 current Osteopathic continuing education rules, which exist  
9 as a separate ruleset, will be rescinded. Those rules will  
10 be added to the Osteopathic General Rules, thus creating  
11 one ruleset for the Osteopathic profession instead of two.  
12 The continuing education requirements for both the Board of  
13 Medicine and Board of Osteopathic Medicine and Surgery  
14 expand the types of activities for which continuing  
15 education is granted and requires additional continuing  
16 education in the area of pain and symptom management, as  
17 required by MCL 333.16204. The new rules will also require  
18 licensees to acquire training in identifying victims of  
19 human trafficking, as required by MCL 333.16148. The rules  
20 will also make changes to both professions regarding the  
21 delegation requirements for physician assistants and nurse  
22 practitioners.

23           For further explanation of these or any of the  
24 social work changes, Regulatory Impact Statements for all  
25 rulesets are in the hall outside the auditorium, and can be



1 found on the website for the Office of Regulatory  
2 Reinvention.

3 Pursuant to MCL 24.245 of the Administrative  
4 Procedures Act, the public hearing is an opportunity for  
5 the public to present data, views, questions, and arguments  
6 in regards to the proposed rules.

7 The Department and Boards of Social Work,  
8 Medicine, and Osteopathic Medicine and Surgery will use the  
9 testimony and documents presented at this hearing to  
10 determine if any changes should be made to the proposed  
11 rules before they are adopted. If you have comments,  
12 please make sure that your comments relate directly to the  
13 proposed rules. If you have questions regarding the rules,  
14 please submit your questions as part of your testimony for  
15 the Department's review. If you have suggestions for  
16 changes to the proposed rules, please include the specific  
17 reasons why the changes would be in the public interest.  
18 For the record when you testify, please identify yourself  
19 by name and organization, if any, that you may be speaking  
20 for today. You may use the cards provided in the lobby for  
21 this purpose. This will help the Department prepare the  
22 hearing record that will go before the Boards. Written  
23 statements can be submitted directly to me at the table.  
24 The Department will also accept written statements emailed  
25 or postmarked until 5 p.m. Friday, March 25th, 2016.



1 Address information can be found in the notice of the  
2 public hearing that we have made available in the hall.

3 The order of testimony will be based upon the  
4 order of cards I receive. If you would like to testify and  
5 have not signed in, please do so now right outside the  
6 door. For those who do not wish to sign in with a card,  
7 you may speak at the microphone once we have exhausted the  
8 stack of cards submitted to me.

9 Department staff present include myself, Karen  
10 Carpenter, who is in the hall, and Kerry Przybylo, all of  
11 the Bureau of Professional Licensing. We don't have a  
12 microphone today. So I would like to ask that commenters  
13 please step to the front of the aisle on the left-hand side  
14 so that the stenographer can clearly hear your comments.

15 The first card that was given to me is from Dr.  
16 Karen VanDeusen. So if Karen would like to come down and  
17 speak, she is welcome to do so at this time.

18 DR. VANDEUSEN: Good morning.

19 MR. SIRACUSE: Good morning.

20 DR. VANDEUSEN: Thank you for the opportunity to  
21 present comments. First, I just want to say thank you for  
22 your revisions to the general rules. I do want to support  
23 a couple of particular changes that you have made, and that  
24 includes to Rule 63(2)(f), page 25, that clarifies  
25 acceptable sources of publication for the CE requirements.



1 And also for revisions to the Boards -- or to R338.2965,  
2 Rule 65(a), VIII with the addition of Cultural Competence  
3 and Diversity as a new content area.

4 Some additional things that I would add have to  
5 do with changes, and that includes page 23, R338.2963,  
6 Acceptable Continuing Education Limitations, and I would  
7 recommend changing the wording of this rule to read: Not  
8 part of the Licensee's regular job requirements. Changing  
9 the word to requirements rather than job description as it  
10 currently reads.

11 Next Rule 63(2)(c), page 24, Academic courses  
12 related to the practice of social work offered in the CSWE  
13 Accredited Educational Program approved by the Board. I'm  
14 recommending that the rule should indicate a CSWE  
15 Accredited School of Social Work, rather than stating only  
16 an educational program.

17 On Page 24, Rule 63(2)(e), I would request  
18 clarification of the wording. Is this rule referring to a  
19 university that offers continuing education outside of  
20 their academic course work? So that is a little bit  
21 unclear and would hold for clarification.

22 Page 25, R338.2965. Continuing Social Work  
23 Education Programs; Methods of Approval Requirements.

24 Rule 65(5)(a)(vi). Social Work Ethics and  
25 Standards of Professional Practice. Related to Social Work



1 Ethics Courses and Trainings, I request that these  
2 trainings be taught only by a licensed Master social  
3 worker, and that that be specified in the rule.

4 And I think that that covers it. I didn't say  
5 that I'm a professor at Western Michigan University in the  
6 School of Social Work, and have been in academia for 16  
7 years now in that accredited program. Thank you for the  
8 opportunity.

9 MR. SIRACUSE: Thank you, Dr. VanDeusen.

10 DR. VANDEUSEN: No questions then?

11 MR. SIRACUSE: No.

12 DR. VANDEUSEN: Thank you.

13 MR. SIRACUSE: The next card that was given to me  
14 was from Maxine Thome. Feel free to correct me if I  
15 mispronounce.

16 MAXINE THOME: I will. I do it often. It's  
17 Thome. I also want to thank you for the work that you have  
18 put into reviewing this licensure and the rules and making  
19 some of the changes that you did. We have a few  
20 corrections.

21 I'm the Executive Director of the National  
22 Association of Social Workers, so I'm talking on behalf of  
23 NASW of Michigan. So to begin with, the issue of pain.  
24 We're very pleased that you increased the number of pain  
25 credits from one to two. We would appreciate it if you



1 could specify that it relates to physical pain. And as  
2 social workers, it's helpful to clarify the difference  
3 between emotional pain and physical pain. So if it can  
4 state physical pain, that would be very helpful.

5 On Page 25, Rule 338.2965, Rule 65. NASW  
6 recommends that pain requirements be added to the list for  
7 approved continuing ed topics. I think it may have been  
8 left off.

9 And 338.2921 on Page 12, Rule 21. If you could  
10 specify that Board means the Michigan Board of Social Work,  
11 that would help, and add that the Department means the  
12 Licensing and Regulatory Affairs Bureau of Health Licenses.

13 On Page 14, Training Standards for Identifying  
14 Victims of Human Trafficking Requirements. NASW recommends  
15 that this rule include a minimum of hours required for this  
16 training and the renewal frequency. NASW recommends that  
17 the human trafficking trainings are reviewed for content  
18 standards and approved by the Michigan Social Work  
19 Continuing Education Collaborative. It may be helpful to  
20 know that all continuing ed requirements, not all, many of  
21 the continuing ed requirements go through the Collaborative  
22 for review, and we believe it would help assure quality and  
23 consistency if the human trafficking programs and  
24 educational courses went through the Collaborative.

25 Page 17 and 20, Rule 338.2941, Bachelor of Social



1 Work license by exam, and Rule 338.2949, Master Social  
2 Worker license requirements. Clarification is needed on  
3 the supervision requirements for both the Bachelors and the  
4 Masters social workers. It is written that 50 percent can  
5 be done individually and in person. So we would appreciate  
6 clarification of the additional 50 percent.

7 Pages 19 and 22 are 338.2945, Relicensure of  
8 Bachelors Social Workers. Rule 45, Refer to grid. NASW  
9 Michigan recommends the inclusion of the required five  
10 continuing education hours in Social Work Ethics. That's a  
11 critical one for our profession, and this is true for the  
12 relicensure for both Bachelors and Masters.

13 Page 23, R338.2963, Acceptable Continuing  
14 Education; limitations. In Rule 63(1) what we're  
15 recommending is that this rule be expanded to include  
16 limitations for home study, with specification on home  
17 study, and expand this rule to include approval by another  
18 state board of social work, ASWB-ACE, or an approving body  
19 designated by the Board. So the addition would be an  
20 improving body designated by the Board.

21 And Page 24, Rule 338.2965, NASW Michigan  
22 recommends that this rule on pre-knowledge, post-knowledge,  
23 or skill improvement is eliminated due to time constraints  
24 and complexity. So that if someone is taking a continuing  
25 ed course, for them to be required to take an exam at the



1 beginning, or some form of pre-test, and then be asked to  
2 take a post-test is pretty time consuming. And if it's a  
3 conference and you have multiple workshops, it's even more  
4 complex to do. So we would like reconsideration of that.

5 And, finally, Rule 65(5)(e) and Rule 65(5)(g),  
6 Clarification is needed on the length of time that  
7 attendance records need to be kept by the providers and,  
8 also, if digital formatting is acceptable. So I'm done.  
9 Thank you.

10 MR. SIRACUSE: Thank you, Ms. Thome. The next  
11 comment card that I received is from Duane Breijak.

12 DUANE BREIJAK: Close.

13 MR. SIRACUSE: Breijak?

14 DUANE BREIJAK: Yes. Good morning. My name is  
15 Duane Breijak. I'm the Director of Member Services with  
16 NASW Michigan. I'm a licensed Macro Social Worker, and  
17 each year I do about 30 to 40 licensure workshops across  
18 the state at the Schools of Social Work. So I'm hearing  
19 from graduating students and limited licensed social  
20 workers on a regular basis.

21 I just have a couple of potential  
22 changes/suggestions for a few of the rules. The first one  
23 is on page 17 and page 19, and this is referring to the  
24 type of work placements that limited licensed Bachelors and  
25 Masters social workers can be placed in. The wording is



1 new. A second sentence has been added that refers to an  
2 agency is considered approved by the Board where the agency  
3 utilizes Masters social workers who engage in the practice  
4 of social work at the Masters level. We find this wording  
5 very potentially troubling. Many limited licensed  
6 Bachelors and Masters level social workers don't work in  
7 agencies where there is a Masters level social worker  
8 licensed on site, and we feel like this would greatly  
9 impact where social workers could potentially work when  
10 they're getting their limited license. So we would ask  
11 either that second part gets stricken, or maybe get a  
12 second piece added where you say consideration will be  
13 given that agencies may not have a licensed Masters social  
14 worker on site. So that is one of the potential rules.  
15 That, again, goes back into the Masters and the Bachelors  
16 section.

17 Page 17 and page 20. So this is Rule 39 Section  
18 2, or Rule 47 Section 2. This is more of a clarification.  
19 This is on when talking about the renewal timeline for  
20 limited license. I think the wording is confusing and  
21 could be altered just slightly to make it much clearer. It  
22 can be interpreted how it's written that there is a maximum  
23 of six years you get to renew your limited license, where  
24 it's actually six times for a total of seven years. So I  
25 think if you clarify the language to read something like a



1 limited license shall be issued for one year and may be  
2 renewed for six times for a total of seven years would  
3 really help clarify that. We get a lot of questions to our  
4 office and when I'm out-and-about about that particular  
5 issue.

6 Then the last potential change is on Page 20.  
7 It's Rule 49, Section 2, Part B, and this is a new addition  
8 to the rules, and it refers to the requirements to take the  
9 second exam, if you wish to get the second designation at  
10 the Masters level. NASW would like to come out against  
11 this proposed change. Part of our fear is that this would  
12 eventually lead to the elimination of the macro license in  
13 the long term. Most of the macro license social workers in  
14 Michigan were grandparented in. We know it's a small pool  
15 who currently are getting that license. So in ten years  
16 from now if you have to take a second test to get that  
17 license, we feel that there won't be supervision available.  
18 As well as if you look at the ASWB content outlines in  
19 terms of exam structure, they're about 80 percent the same  
20 between the clinical and the macro exam. So those taking  
21 the macro or the clinical are already getting content in  
22 both areas, and we feel that the requirement of work and  
23 supervision additionally is sufficient.

24 So those are the three changes that I have.  
25 Thank you for your time.



1           MR. SIRACUSE: Thank you, Mr. Breijak. The last  
2 card that was submitted to me is from Michele Brock, and  
3 she has let me know that she will be submitting her  
4 comments via e-mail.

5           It's open comment time, now that I have exhausted  
6 my cards. So if you have a comment, we can potentially  
7 form a line, or if you can work it out amongst yourselves  
8 who's coming up and when. Again, I would remind you that  
9 if you do have comments, please step to the front of the  
10 left-hand aisle so that our transcriber can hear you  
11 effectively. So welcome to any more comments on any of the  
12 rulesets at today's hearing. Any rulesets, any comments  
13 from any rulesets? Otherwise, we will have to sit and  
14 stare at each other for another 94 minutes. Which we're  
15 happy to do, but not much else is going to happen at this  
16 event. In lieu of additional comments at the present time,  
17 I will give our transcriber permission to cut until we need  
18 to go back on the record.

19           (Off the record)

20           DR. VANDEUSEN: Hello. I'm Dr. Karen VanDeusen,  
21 Western Michigan University, Professor in the School of  
22 Social Work.

23           And I, given my comments earlier, I was concerned  
24 about being brief and direct and didn't offer some  
25 rationale. So I wanted to offer rationale just related to



1 one of my earlier comments, which has to do with Rule 33 --  
2 or 338.2963, Acceptable Continuing Education Limitations,  
3 Rule 63(2)(b) where I had recommended changing job  
4 requirements to job description. I wanted to just share  
5 that this is based on my experience as a professor where  
6 the job description can be quite broad and it can include  
7 teaching, for example. It also can include activities  
8 related to professional recognition. Within those  
9 expectations you can do a number of things. Job  
10 responsibilities related to teaching would have to do with  
11 teaching a certain number of specific academic courses.  
12 However, if you're out there in the community and you're  
13 teaching programs or trainings for continuing education  
14 credit, that would go above and beyond your job  
15 responsibilities, but it could be considered as a task  
16 under a description, although you would not find the  
17 requirement of doing specific continuing education  
18 trainings. But because that is unclear, it could limit the  
19 opportunities that academic professors have to get credit  
20 for doing continuing education trainings, if it's  
21 considered more broadly under job description rather than  
22 job responsibilities. Similarly, professors will often  
23 present at conferences with the goal of presenting their  
24 scholarship, and the goal isn't to provide us CE training,  
25 although there might be C credits associated with that



1 presentation. So, again, it's given -- the term job  
2 description might limit those opportunities for professors  
3 specifically to be able to get credit for a number of  
4 things that they might be doing that also apply to  
5 continuing education credits. So I don't know if I made  
6 that more clear or more confusing, but thank you.

7 MR. SIRACUSE: Thank you. Soliciting any further  
8 comments on any of the rulesets this morning?

9 AMY VLIEK: Good morning. My name is Amy Vliek.  
10 I'm Director of Admissions at Western Michigan University.

11 MR. SIRACUSE: Can you spell your last name.

12 AMY VLIEK: It's V-L-I-E-K.

13 MR. SIRACUSE: Thank you.

14 AMY VLIEK: I'm here with a bunch of our  
15 students, Masters level social work students, and I'm just  
16 curious to know, it's not a question about the rules so to  
17 say, but how people were notified about this meeting.  
18 Because at my university I didn't get any notification from  
19 the board at all, and I only knew about it because Dr.  
20 VanDeusen forwarded it to our faculty that she was going to  
21 be in attendance, and I'm asking because I'm wondering if  
22 all of the universities in Michigan were notified of the  
23 meeting, because my guess is that they would have some  
24 feedback and information to give. And I'm just curious to  
25 know how people were notified, and what other means there



1 is that the Board is using to elicit information and public  
2 feedback on these rules.

3 MR. SIRACUSE: Thank you for your comments.

4 AMY VLIEK: You don't know the answer?

5 MR. SIRACUSE: I do know the answer.

6 AMY VLIEK: Oh, can you give it to me or not? I  
7 don't know all the rules.

8 MR. SIRACUSE: It's not the proper forum for an  
9 ongoing discussion.

10 AMY VLIEK: Gotcha.

11 MR. SIRACUSE: I gave that information at the  
12 beginning of the public hearing in my speech. If there are  
13 no comments, we can go off the record and engage in that  
14 conversation. But your comments will be given to the  
15 Board.

16 AMY VLIEK: Okay. Thank you.

17 (Off the record)

18 (Hearing concluded at 11:00 a.m.)  
19  
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21  
22  
23  
24  
25



1 STATE OF MICHIGAN )

2 ) ss.

3 COUNTY OF INGHAM )

4

5 I HEREBY CERTIFY THAT I reported  
6 stenographically the foregoing proceedings at the  
7 time and place hereinbefore set forth; that the  
8 same was later transcribed by means of  
9 computer-aided transcription; and that the  
10 foregoing is a true, full and correct transcript  
11 of my stenographic notes so taken.

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17 Janet A. Vroman, CSR 3-28-16

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19 \_\_\_\_\_  
Notary Public, Ingham County, Michigan

20 My commission expires February 21, 2017

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**Social Work General Rules - ORR 2014 - 157 LR**  
**Public Comment Summary**  
**Rules Committee and Board responses to March 23, 2016 Public Comment**

**Testimony/Comments Received:**

- |   |  |
|---|--|
| 1. Gary Anderson, PhD, LMSW   | 11. Greg Paffhouse, Retired Master Level Social Worker   |
| 2. Brad Bender, Masters of Social Work Student  | 12. Paul T. Peppin, LMSW   |
| 3. Diane Blumson, ACSW BCE  | 13. Vicki Poleni, LMSW   |
| 4. Duane Breijak, Director of Member Services, National Association of Social Workers       | 14. powers@charter.net   |
| 5. Michele Brock, LMSW, Former Board Member   | 15. Suzanne Prich, LMSW  |
| 6. Roxanna Duntley-Matos, MA, LMSW, PhD, Assistant Professor at Western Michigan University | 16. Maxine Thome, Executive Director of the National Association of Social Workers (Representing NASW) |
| 7. Judy Levick, MSW, ACSW, LMSW   | 17. Dr. Karen VanDeusen, Professor at Western Michigan University                                      |
| 8. Cathy Meske  | 18. Amy Vliek  |
| 9. Robin Mingus, RSST from NASW   | 19. Jerry and Barbara Zielinski  |
| 10. Richard Osburn, LMSW, LMFT, ACSW, DCSW  |  |



**Rule 338.2921 Definitions**

Rule Numbers	Commenter	Comment
338.2921(a)	9, 16	Requests specification that Board means the Michigan Board of Social Work.
338.2921	9, 16	Requests adding a definition for Department to mean the Licensing and Regulatory Affairs, Bureau of Health Licenses.
<b>Rules Committee Response</b>	<p>338.2921(a): The rules committee agrees that the definition of board should be defined as the Michigan Board of Social Work.</p> <p>338.2921 The rules committee declined to add the definition of department to the rules because it would be unnecessarily duplicative.</p>	

Based on the Rules Committee's recommendations, the proposed rule would read:

(a) "Board" means the **Michigan** Board of Social Work.

**BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE'S RECOMMENDATION.****Rule 338.2929 Training Standards for Identifying Victims of Human Trafficking; Requirements**

Rule Numbers	Commenter	Comment
338.2929	9, 16	<p>Recommends that this rule include a minimum of hours required for this training and the renewal frequency.</p> <p>Recommends that the human trafficking trainings are reviewed for content standards and approved by the Michigan Social Work Continuing Education Collaborative in order to assure quality and consistency of the programs. This will allow social workers to know the specific requirements in order to maintain licensure.</p>
	10	What is the legal foundation for licensing boards to deny requests for other areas of training to be specifically required for licensure? (Homeless, AIDS, Poverty, Cultural Diversity training?) When social work was finally licensed, it was decided to be all inclusive or all exclusive concerning specific professional training. There are other ways of training health professionals in human trafficking that would avoid this procedural swamp.



		<p>Since training has a component reporting section and since this training is a requirement for license, does this mean that there will be mandatory reporting similar to what is in Child Protection and Adult Protection statutory requirements?</p> <p>If so, then what is the legal statutory definition of human trafficking for the State of Michigan?</p> <p>To whom does one report and at what level of "rules of evidence?" Child and Adult Protective Laws have the reporting at the suspected or concerned level and not at any of the formal evidenced levels. Will this be the same for human trafficking reporting?</p> <p>Will the person doing the reporting receive the same legal protection of confidentiality of reporting as reflected in Child and Adult Protective Statutes?</p> <p>With the training, there will be an increase in reporting. Is the legal infrastructure in place to manage the increased number of reports and be able to do quick investigative action?</p> <p>Is there enough protective housing available to provide safety and support for the victims?</p> <p>Are there changes in Michigan law to support the victims? For example, would a 14 year old prostitute be viewed as a victim of sexual abuse and/or statutory rape or would they be viewed as a violator of criminal sexual laws?</p> <p>Recommendation: pull the training section out for now until there is a full review by health care professions, courts and law enforcement for this section will impact all of these areas. Perhaps have human trafficking inserted into the current Child Protection and Adult Protection laws with clear legal definitions.</p>
338.2929(3)	15	The rule does not clearly indicate how often the training is required. Is this required one time in the course of our career or is it required with every license renewal?
	15	How many CEU's are required for Human Trafficking?
<b>Rules Committee</b>	This rule was mandated by MCL 333.16148. Rules Committee declines to add information about the minimal hours	



<b>Response</b>	required for the training of awareness of human trafficking, the amount of CE's or how often the training is required. The reasons given are that the information is provided in the statute, it is a licensure requirement, not a CE requirement and the training only needs to be done one time per statute.
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**BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE'S RECOMMENDATION.**

#### **Rule 338.2931 Limited Social Service Technician Registration Requirements**

Rule Numbers	Commenter	Comment
338.2931(1)(a)	15	A limited social service technician, according to the rules, does not need any education in social work or human services in order to be registered. This should not be the case. Education in social work or human services should be required for registration.
<b>Rules Committee Response</b>	The Rules Committee declines to change the rule pertaining to increase the educational standards of a limited social service technician as the technician is supervised by social workers.	

**BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE'S RECOMMENDATION.**

#### **Rule 338.2939 Limited Bachelor's Social Work License**

Rule Numbers	Commenter	Comment
338.2939(1)(a)	10	The language is fuzzy as to the requirement that a BSW must have a social work degree from a CSWE accredited social work program. It needs to be clearly stated that it is a CSWE accredited social work program as it is the foundational standard for quality training of the social work profession as well as one for social workers to work and be licensed in other states an even other countries.
338.2939(1)(d)	4, 9	The second sentence is new. This sentence is troubling as many limited licensed Bachelor's and Master's level social workers don't work in agencies where there is a Master's level social worker licensed on site. This sentence would greatly impact where social workers could potentially work



		when they are getting their limited license. Therefore, it is requested that either the second sentence get stricken or maybe add language allowing for consideration of agencies that may not have a Licensed Master Social Worker on site.
339.2939(2)	4, 9	The wording is confusing. It can be interpreted that there is a maximum of six years you get to renew your limited license. In actuality, it is six times for a total of 7 years. The language should be clarified to state that " <b>a limited license can be renewed six times for a total of seven years . . .</b> "
	15	The rule needs to be clearer about what happens if a person does not pass the licensing examination and is no longer able to renew his or her limited license after six years. Is a person expected to go back to school? Is he or she allowed to continue trying to pass the examination? If a person does not pass the exam, may he or she still call himself or herself a social worker on the basis of his or her degree from a university. Clarification language on this issue would be helpful.
<b>Rules Committee Response</b>	<p>The Rules Committee declines to make any of the suggested changes to Rule 338.2939(1) because the requested information is duplicative of Rule 338.2923.</p> <p>The Rules Committee declines to make the suggested changes to Rule 338.2939(2) as the language as written is clear and conforms with the intent for which it was written.</p>	

**BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE'S RECOMMENDATION.**

**Rule 338.2941 Bachelor's Social Worker License by Examination; Requirements; Graduates for Schools in Compliance with Board Standards; Limited Bachelor's Social Worker License.**

Rule Numbers	Commenter	Comment
339.2941(1)(a)	10	The language is fuzzy as to the requirement that a BSW must have a social work degree from a CSWE accredited social work program. It needs to be clearly stated that it is a CSWE accredited social work program as it is the foundational standard for quality training of the social work profession as well as one for social workers to work and be licensed in other states an even other countries.
338.2941(3)(b)(iii)	9, 16	"Clarification is needed on the supervision requirements. It is written that 50% can be done individually and in person. So the NASW would appreciate clarification of the additional 50%."



<b>Rules Committee Response</b>	<p>The Rules Committee declines to make the changes to Rule 339.2941(1)(a) because this language is adopted by reference pursuant to Rule 339.2923 and it would be duplicative.</p> <p>The Rules Committee declines to make the recommended changes to Rule 338.2941(3)(b)(iii) because it wanted to leave options open for technological advancements.</p>
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**BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE’S RECOMMENDATION.**

**Rule 338.2945 Relicensure of Bachelor's Social Worker**

Rule Numbers	Commenter	Comment
338.2945	9, 16	NASW recommends the inclusion of the required 5 continuing education hours in Social Work Ethics as it is critical for the profession and relicensure for Bachelor’s Social Worker. This critical requirement was left out of the statement of all CE requirements.
<b>Rules Committee Response</b>	The Rules Committee agrees that the rule should specifically include the required 5 continuing education hours in ethics. Further, it was recommended that the table be reformatted to include letter references to the rows.	

**Based on the Committee’s recommendation, the proposed rule would read:**

(b) Continuing education: Submit proof of having completed 45 hours of continuing education in courses and programs approved by the board, including at least **5 hours in social work ethics** and 2 hours in pain and symptom management as provided under R 338.2961, which was earned within the 3-year period immediately preceding the application for relicensure.

**BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE’S RECOMMENDATION.**



**Rule 338.2947 Limited Master's Social Worker License Requirements**

Rule Numbers	Commenter	Comment
338.2947(1)(a)	10	The language is fuzzy as to the requirement that a MSW must have a social work degree from an accredited social work program. It needs to be clearly stated that it is a CSWE accredited social work program as it is the foundational standard for quality training of the social work profession as well as one for social workers to work and be licensed in other states an even other countries.
338.2947(1)(d)	4, 9	The second sentence is new. This sentence is troubling as many limited licensed Bachelor's and Master's level social workers don't work in agencies where there is a Master's level social worker licensed on site. This sentence would greatly impact where social workers could potentially work when they are getting their limited license. Therefore, it is requested that either the second sentence get stricken or maybe add language allowing for consideration of agencies that may not have a Licensed Master Social Worker on site.
339.2947(2)	4, 9	The wording is confusing. It can be interpreted that there is a maximum of six years you get to renew your limited license. In actuality, it is six times for a total of 7 years. The language should be clarified to state that <b>"a limited license can be renewed six times for a total of seven years."</b>
<b>Rules Committee Response</b>	The Rules Committee declines to make the changes to Rule 339.2947 because this language is adopted by reference pursuant to Rule 339.2923 and it would be duplicative to repeat the information. The Rules Committee declines to make the suggested changes to Rule 338.2947(2) as the language as written is clear and conforms with the intent for which it was written.	

**BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE'S RECOMMENDATION.**

**Rule 338.2949 Master's Social Worker License Requirements; generally**

Rule Numbers	Commenter	Comment
338.2949	10	The language should state that a license for a Master's in social work requires that a MSW must have a social work degree from an accredited social work program. It needs to be clearly stated that it is a CSWE accredited social work program as it is the foundational standard for quality training of the social work profession as well as one for social workers to work and be licensed in other states an even other countries.



338.2949(1)(b)(iii)	9, 16	Clarification is needed on the supervision requirements. It is written that 50% can be done individually and in person. So the NASW would appreciate clarification of the additional 50%.
338.2949(1)(c)(i) and (ii)	13	<p>An applicant for a Limited Master's Social Worker License requires the applicant to comply with the supervision requirements of Rule 338.2923(c). The Supervisor Verification of Social Work Experience for Master's Social Worker form completed by the supervising LMSW demands that regardless of the number of hours spent in paid employment, an LLMSW must have 1 hour of supervision per week. This language suggests that LLMSW's who are employed part time are required to receive twice as much supervision as full time employees. A part time LLMSW may struggle to ensure weekly supervision due to fewer hours worked and less money earned. Working part time and paying for full time supervision services may not financially be within their means. Experience shows that many limited license professionals choose not to receive the vital supervision.</p> <p>Commenter recommends that the language and requirements for the accumulation of supervision more closely match the number of employed hours in the field, rather than the blanket requirement of 4 hours per month regardless of the employed hours per month.</p>
338.2949(2)(b)	4, 9	<p>NASW recommends that the requirement of taking an exam for a second designation be removed. There is concern that this would lead to the elimination of the macro license in the long term. Most macro licensed social workers were grandparented in. In 10 years, if you have to take a second test to get that license, we feel that there will not be supervision available.</p> <p>Further if you look at the ASWB content outlines in terms of exam structure, they are about 80% the same between the clinical and the macro exam. So those taking the macro or the clinical are already getting content in both areas. Requiring a second exam will not increase competency.</p> <p>The NASW feels that the requirement of work and supervision additionally is sufficient.</p> <p>Lastly, NASW objects to this proposed change as it may place an increased financial and time burden on licensed professionals and employers. There has been a substantial increase in the number of Macro students over the past several years.</p>
	2, 6	Remove the addition of an advanced generalist exam in order for MSW graduates to get a second endorsement. This makes it difficult for economically vulnerable graduates to practice system's



		based social work which is the backbone of our profession. Recommendation: offer a combined endorsement as it was in previous generations without additional cost.
<b>Rules Committee Response</b>	<p>The Rules Committee declines to make suggested changes to Rule 338.2949(1) because this language is adopted by reference pursuant to Rule 339.2923 and it would be duplicative.</p> <p>The Rules Committee declines to make the recommended changes to Rule 338.2949(1)(b)(iii) because it wanted to leave options open for technological advancements.</p> <p>The Rules Committee declines to make the suggested changes to Rule 338.2949(1)(c) (i) and (ii) because the committee wants to conform to the minimal supervisory standards that are required.</p> <p>The Rules Committee declines to make the suggested changes to Rule 338.2949(2)(b) because it wants to conform AWSB-ACE standards.</p>	

**BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE'S RECOMMENDATION.**

**Rule 338.2951 Master's Social Worker License; Macro Designation**

Rule Numbers	Commenter	Comment
338.2951	10	The language should state that a license for a Master's in social work requires that a MSW must have a social work degree from an accredited social work program. It needs to be clearly stated that it is a CSWE accredited social work program as it is the foundational standard for quality training of the social work profession as well as one for social workers to work and be licensed in other states an even other countries.
<b>Rules Committee Response</b>	The Rules Committee declines to make the changes to Rule 339.2951 because this language is adopted by reference pursuant to Rule 339.2923 and it would be duplicative.	

**BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE'S RECOMMENDATION.**



**Rule 338.2953 Master's Social Worker License; Clinical Designation**

Rule Numbers	Commenter	Comment
338.2953(a)	10	The language should state that a license for a Master's in social work requires that a MSW must have a social work degree from an accredited social work program. It needs to be clearly stated that it is a CSWE accredited social work program as it is the foundational standard for quality training of the social work profession as well as one for social workers to work and be licensed in other states an even other countries.
<b>Rules Committee Response</b>	The Rules Committee declines to make the changes to Rule 339.2947 because this language is adopted by reference pursuant to Rule 339.2923 and it would be duplicative.	

**BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE'S RECOMMENDATION.**

**Rule 338.2955 Relicensure of Master's Social Worker**

Rule Numbers	Commenter	Comment
338.2955	9, 16	NASW recommends the inclusion of the required 5 continuing education hours in Social Work ethics as it is critical for the profession and relicensure for Master's Social worker. This critical requirement was left out of the statement of all CE Requirements.
Rules Committee Response	The Rules Committee agrees that the rule should specifically include the required 5 continuing education hours in ethics. Further, it is recommended that the table be reformatted to include letter references in the rows.	

**Based on the Committee's recommendation, the proposed rule would read:**

(b) Continuing education: Submit proof of having completed 45 hours of continuing education in courses and programs approved by the board, including at least **5 hours in social work ethics** and 2 hours in pain and symptom management as provided under R 338.2961, which was earned within the 3-year period immediately preceding the application for relicensure

**BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE'S RECOMMENDATION.**



**Rule 338.2961 License Renewals; Continuing Education Requirements**

Rule Numbers	Commenter	Comment
338.2961(1)	9, 16	Thank you for increasing the number of pain credits from one to two. Recommends that the rule specify that this relates to physical pain. (It does not rule out emotional pain). The definition should include that CE will meet requirements if it addresses physical pain.
	7	The CE requirements are too high. Social workers can not afford this and the hours are not in line with other professionals. Please consider reducing the numbers of hours to perhaps 35 or 40 over a 3 year period or offer more FREE CE's for social workers.
	1, 5	Commenter is in support of this rule as it pertains to 5 hours of required ethics and keeping the content and instructor requirements the same. The content of a continuing education program must meet R338.2965 (5)(a) i-viii and the instructor qualifications are clearly outlined in the ASWB ACE Guidelines referenced in that rule. ASWB ACE guidelines require a social work consultant assure the program is in compliance with these standards. Narrowing who is specifically qualified beyond what the rules already cite seems to place an undue restriction and burden on training that would ultimately help practitioners better serve the public.
<b>Rules Committee Response</b>	The Rules Committee declined to make any changes to Rule 338.2961(1) as it wanted the definition to include physical and emotional pain. Further, there will be no changes to the amount of CE hours as Michigan's CE hours are in line with other state requirements for CE. Lastly, the rule does not narrow who is specifically qualified to teach CE programs and the board will not place limitations in the rule. There are members of different professions whose experience can provide different perspectives for social workers to learn from.	

**BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE'S RECOMMENDATION.****R 338.2963 Acceptable Continuing Education; Limitations**

Rules	Commenter	Comment
338.2963(1)	12, 14	Not having the ability to complete the CEU completely on line negatively impacts colleagues who are in the twilight of their careers, work part time and do not have the luxury of having an agency fund and support their direct contact hours. Further, many social workers have already paid for



		<p>unlimited online course credits and have been completing the testing necessary for the next cycle or relicensure. These proposed rules may have an unintended consequence of senior social workers opting out of the profession due to the cost of maintaining their license.</p> <p>Recommendation: Modify the language so that social workers in good standing with 45 plus years of continuous licensure in Michigan can be granted some exemption status in pursuing their renewal license. Further, NASW has a reduced membership rate for senior social workers. Michigan should support some type of accommodation for senior social workers as this profession has always stood for inclusion and lowering obstacles for seniors as well as the disadvantaged. Before approving this revision, open up some dialogue on this concern so that the individual within the social work profession will be considered.</p>
	6	Disagrees with discontinuing home study for full continuing education credit. (45 credits). I recommend that home study be allowed for the full load of credit requirements and that it be made clear in the rules.
	8, 11	It seems that complete on-line continued education is eliminated. This is a mistake given the increased acceptability and use of online learning. As a retired master level social worker, this online availability of continuing education will be a likely option. Further, it is a reasonable option for rural practitioners.
	3	The proposed revisions seem to place an undue financial burden on licensees who will need to be paying larger workshop fees in addition to potential travel expenses and lost work time.
	17	Thank you for clarifying the acceptable sources of publication for CE requirements.
	19	Acceptable continuing education requirements are too strict in prohibiting more than half of the required CEU's to be earned from online or electronic media. Social work is not a highly paid profession and conferences are expensive. Home study is an effective means of learning and is available at much lower costs and should be an acceptable means of earning all CEU's.
338.2963(2)(c)	17, 9	Consider revising to "...continuing education program that is not part of the licensee's regular job requirements . . . ." For a person in academia, providing continuing education trainings goes above and beyond the job requirements yet it may be included in job responsibilities, as it is teaching. The wording, as written, would limit the opportunities that academic professors have to get credit for providing continuing education trainings if it's considered more broadly under job description rather than job responsibilities.



338.2963(2)(d)	9, 17	Consider revising to "Academic courses related to the practice of social work offered in a CSWE Accredited School of Social Work. . . ."
	9	Expand this rule to include "approval by another state board of social work, ASWB-ACE, <b>or an approving body designated by the board.</b> "  Further, the Michigan Continuing Education Collaborative should be listed as the third approving body.
338.2963 (2)(e)	14	NASW recommends expanding this rule to include "approval by another state board of social work, ASWB-ACE, <b>or an approving body designated by the board.</b> "
	9, 17	Request clarification of the wording of this rule. Is it referring to a university that offers continuing education outside of their academic course work?
<b>Rules Committee Response</b>	<p>The Rules Committee agrees with the comments made for Rule 338.2963(1). There was an unknown edit made to the original wording of the rule.</p> <p>The Rules Committee declines to make changes to Rule 338.2963(c) because the category is self-explanatory and the committee does not wish to legislate for on this matter that will only benefit a minor percentage of the profession.</p> <p>The Rules Committee declines to make changes to Rule 338.2963(d) and (e) because the language is self-explanatory and the board does not wish to be in the business of approving continuing educational programs.</p>	

**Based on the Rules Committee's recommendations, the proposed rule would read:**

**R338.2963 Acceptable continuing education; limitations.**

Rule 63. (1) **One half of the required continuing education contact hours must be completed in person using live, synchronous contact. The remaining continuing education contact hours may be completed in any other approved format.**

**BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE'S RECOMMENDATION.**



### **R 338.2965 Continuing Social Work Education Programs; Methods of Approval**

<b>Rule</b>	<b>Commenter</b>	<b>Comment</b>
338.2965	9, 16	Recommends that pain requirements be added to the list for approved continuing education topics.
338.2965(5)(a)(vi)	9, 17	Requests that the wording be altered to require the training to be taught only by a Licensed Master Social Worker. Only a licensed Master's Social Worker is qualified to teach social work ethics.
338.2965(5)(a)(viii)	17	Thank you for the addition to Cultural Competence and Diversity as a new content area.
338.2965(5)(e)	9, 16	NASW recommends that this rule on pre-knowledge and post-knowledge or skill improvements be eliminated due to time constraints and complexity. The reason for the request is social workers need to know what pre-knowledge and post-knowledge is referring to.
338.2965(5)(g)	9, 16	Clarification is needed on the length of time that attendance records need to be kept by the providers and whether digital formatting is acceptable.
<b>Rules Committee Response</b>	The Rules Committee declined to make any of the suggested changes above because pain and symptom management are already delineated continuing educational topics, members of other professions are able to teach educational programs for social work as attendees can learn from their experiences. Further the requirement for continuing social work education program to provide measurements of pre-knowledge and post-knowledge or skill improvements will not be altered. This rule does not require a pre and post -test. It simply requires that the program provide a way for the attendees to measure their knowledge or skill improvement once the program is completed.	

### **BOARD RESPONSE: THE BOARD AGREES WITH THE RULES COMMITTEE'S RECOMMENDATION.**

<b>Other Comments</b>	<b>Commenter</b>	<b>Comment</b>
Notice of the Meeting	18	Questioned how the universities were given notice of the meeting. The commenter missed the instructions given at the beginning of the hearing which contained all of that information.
<b>Response</b>	The statutorily required manner of notification was provided to the commenter off the record at the public hearing. They were advised to subscribe to the Michigan Register in order to be updated on public hearing announcements.	