

**SUNRISE ANALYSIS UPDATE  
OF A PROPOSAL TO REGULATE  
SOCIAL WORKERS**

**A Report to the Governor and the Legislature of the State of Hawaii**

**Submitted by**

**Legislative Auditor of the State of Hawaii  
Honolulu, Hawaii**

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## **SUNRISE ANALYSIS UPDATE OF A PROPOSAL TO REGULATE SOCIAL WORKERS**

### **Introduction**

In 1984, the Legislature amended the Hawaii Regulatory Reform Act, or the “Sunset Law,” by incorporating a “sunrise” provision requiring the Legislative Auditor to analyze proposed legislation that would impose licensing or other regulatory controls on unregulated occupations.

The Legislative Auditor is required to assess the probable effects of the proposed measure and to determine whether its enactment would be consistent with state regulatory policies in the Sunset Law. These policies establish criteria for regulation such as the following:

- . Regulation is warranted only where reasonably necessary to protect the health, safety, and welfare of consumers.
- . Evidence of abuse shall be accorded great weight in determining whether regulation is desirable.
- . Regulation shall not be imposed except to protect relatively large numbers of consumers who may suffer a disadvantage in choosing the provider of the service.
- . Regulation should not unreasonably restrict entry into the occupation by qualified persons.
- . Regulation should protect the consumer and not the regulated profession.

During the 1988 legislative session, Senate Bill No. 2524 relating to social workers was introduced. The bill would establish licensing requirements for the practice of social work. This proposal was referred to the Legislative Auditor for sunrise analysis of whether its enactment would be consistent with sunset law policies.

An analysis of the practice of clinical social work was conducted by this office and reported in January 1986 in the *Sunrise Analysis of a Proposal to Regulate the Practice of Clinical Social Work*. This analysis update contains background information on the social work profession, an examination of the need to regulate the practice of social work, and an assessment of the most recently proposed legislation.

## **The Social Work Profession**

Social work is a profession which focuses on helping individuals, groups, or communities function more effectively in their environment. It involves working with both the person and the environment which might include the person's family, peers, school, or employer.

Social work as an occupation has its beginnings in the state boards of charities established during the late 1800s. These state boards provided the administrative services for institutions responsible for the care of the poor, the physically and mentally ill, and prisoners. The establishment of Charity Organization Societies and settlement houses primarily concerned with helping the poor also contributed to the emergence of social work as an occupation.<sup>1</sup>

During this century, the focus has been on the development of social work into a profession. The National Social Workers Exchange, which later became the American Association of Social Workers, was established and became involved in defining the professional standards. Other specialized associations were formed. In a move to unify the social work profession, the several organizations merged and the National Association of Social Workers (NASW) was established in 1955.<sup>2</sup>

Nationwide in 1986, social workers were employed in approximately 365,000 jobs in government agencies, voluntary social service agencies, community and religious organizations, hospitals, nursing homes, and home health agencies.<sup>3</sup> Social workers work in both urban and rural areas in the United States.

Social work fields include child welfare and family services, psychiatric and mental health services, public assistance, medical social work, gerontological social work, school social work, community organization, planning and policy development, and social welfare administration. Social workers in each of these areas provide various kinds of services such as counseling, case management, an individual and group therapy.

The NASW has developed the following definition of social work practice:

“Social work practice consists of professionally responsible intervention to (1) enhance the developmental, problem-solving, and coping capacities of people, (2) promote the effective and humane operation of systems that provide resources and services to people, (3) link people with systems that provide them with resources, services and opportunities, and (4) contribute to the development and improvement of social policy.

“The interventions are provided to individuals, families, small groups, organizations, neighborhoods and communities. They involve the disciplined application of knowledge and skill to a broad range of problems which affect the well-being of people, both directly and indirectly. They are carried out at differentiated levels of knowledge and skill, through an organized network of professional social workers within the boundaries of

ethical norms established by the profession and the sanction of society. Within these norms, the interventions may be carried out in cooperation with other helping disciplines and organizations as part of any human service enterprise.”<sup>4</sup>

The NASW is the largest organization of professional social workers with approximately 110,000 members and 55 chapters in the United States, the Virgin Islands, Puerto Rico, and Europe.<sup>5</sup> Members are required to have a master’s or bachelor’s degree in social work. NASW also grants associate membership to social service workers with non-social work bachelor’s degrees.

The Academy of Certified Social Workers (ACSW) is part of the NASW organization and provides standards for the certification of social workers in independent social work practice. In addition to other requirements, NASW members are required to pass the ACSW written examination to qualify for admission into the ACSW.

In Hawaii, the NASW estimates that there are approximately 2,400 social workers. Social workers are employed in the state government, federal government, private social service agencies, private hospitals, and private independent practice.

The state government is the largest single employer of social workers. It has approximately 960 social worker positions within the Department of Human Services, Department of Health, Department of Corrections, Department of Education, University of Hawaii, and the Judiciary. The social workers work in various state programs such as public welfare, parole, and mental health.

**Regulation of social work.** Prior to 1964, only Puerto Rico, California, and Rhode Island regulated the practice of social work. Since 1964, when the NASW adopted a policy supporting the legal regulation of social work practice, the number of jurisdictions which regulate the practice of social work has increased to 42 states, Puerto Rico, the Virgin Islands, and the District of Columbia.<sup>6</sup>

The scope of regulation of social work practice varies among the states. Some states such as Massachusetts and Virginia require all social workers to be licensed while other states such as California regulate only clinical social workers. Regulation of only the title of social worker is mandated in 15 states. The remaining states either regulate the practice of social work or a combination of the practice of social work and the use of the title. A majority of the states exempt certain groups from the licensing requirements.

The effort to regulate social workers in Hawaii began in 1974 when the NASW-Hawaii Chapter (NASW-Hawaii) designated licensure as its top priority. It has attempted to obtain the regulation of the social work practice through legislation introduced at various times over the past 13 years.

In 1982, the Department of Commerce and Consumer Affairs (DCCA) conducted a study of the need to regulate the practice of social work at the request of the Legislature. Applying the criteria established in the Sunset Law, DCCA found no evidence of fraud or of complaints involving social workers in Hawaii. DCCA also determined that it was difficult to support NASW's argument for the need to protect disadvantaged consumers because protection is already provided by public and private agencies and because a high proportion of clients who obtain services from private practitioners are in the middle and upper middle classes. The department concluded that there was no justification to regulate social workers.

### **Findings and Recommendation in the 1986 Sunrise Analysis Report**

Senate Bill No. 1131 relating to social work was introduced during the 1985 legislative session. This proposal established licensing requirements for the practice of clinical social work. The Legislative Auditor conducted a sunrise analysis of the proposed regulation.

In our 1986 sunrise analysis, we reported the following findings:

- “1. There is no evidence that consumers have been or are likely to be injured by clinical social workers in private practice.
- “2. Consumers of these private services are relatively few in number and are not likely to be disadvantaged in selecting a provider.
- “3. Regulation may restrict entry into the occupation.
- “4. The impetus for regulation comes from social workers and regulation will benefit primarily social workers and not consumers.
- “5. There are numerous problems with Senate Bill No. 1131 including the broad and unclear scope of practice that is subject to regulation, the questionable validity of standards for licensure, and other inconsistent, confusing, and contradictory provisions.”

**No evidence of harm.** We found no documented evidence of harm to consumers by clinical social workers in the private sector. In addition, the Office of Consumer Protection and the Ombudsman's Office had not received any complaints against social workers or clinical social workers in Hawaii.

**Few consumers of services.** Although data were not available on the number of consumers of clinical social work services, we concluded that it was probably a small number because the

number of clinical social workers in private practice was extremely small. NASW-Hawaii estimated that Hawaii had 10 to 15 full-time private practitioners.

**Licensing costs might be restrictive.** Regulatory programs with few licensees generally must require high licensing fees if the fees are to cover the cost of regulation. Based on the small number of clinical social workers, we concluded that the licensing fees might be prohibitive and thereby restrict entry into the occupation.

**Clients not disadvantaged.** We concluded that clients of clinical social work services are not likely to be disadvantaged. Clients of clinical social workers in most private agencies are already offered recourse if they have any complaints. Private, independent social workers are likely to provide services to clients who are in the middle-income or higher-income class, who can pay for these services, and who are in a position to exercise discretion in their utilization of such services.

**Impetus for regulation.** We found that the impetus for regulation came from social workers. This is contrary to sunset law policy which holds that the purpose of regulation is to protect the consumer. NASW saw licensing as a means to promote professionalism and third-party reimbursements for social workers.

**Conclusion and recommendation.** We concluded that no evidence existed that licensing was needed in Hawaii to protect the public against harm caused by clinical social workers. Thus, we recommended that Senate Bill No. 1131 not be enacted.

### **Current Proposal to Regulate Social Work**

The purpose of Senate Bill No. 2524 is “to protect the public by setting minimum qualifications for those who wish to practice social work, by creating exclusive titles corresponding to specified levels of qualifications, and by providing for disciplinary sanctions to be imposed against persons who do not meet or adhere to the qualifications and standards set out in this chapter.”

Senate Bill No. 2524 proposes to regulate the practice of social work. It defines the practice of social work as follows:

“...the professional activity of helping individuals, groups, or communities enhance or restore their capacity for physical, psychosocial, and economic functioning. It is the professional application of social work values, principles, and techniques which include methods of social case work, psychotherapy, social service administration, social planning, social work consultation, and client-centered advocacy.”

The bill prohibits anyone from performing any social work service or representing oneself as a social worker unless the person is licensed. The bill would exempt: (1) individuals involved

in activities which overlap with the practice of social work; (2) federal employees; and (3) students in education programs accredited by the Council of Social Work Education. Thus, social workers in private independent practice and those employed by the state or local governments and private agencies would be required to be licensed.

A Board of Social Work Examiners would be created consisting of five members of the social work profession and two public members. The board would be given the authority to carry out certain duties and functions. For example, it would be empowered to approve and oversee all examinations, recommend civil action against unlicensed individuals, grant provisional licenses, subpoena any person, and conduct hearings.

To qualify for a license under this bill, an applicant must (1) be at least 18 years of age, (2) be a United States citizen or a legal resident alien, (3) if convicted of a felony, have been discharged from prison, parole, or probation for a minimum of two years prior to applying for a license, (4) not have been declared mentally incompetent by any court, and (5) be determined by the board to warrant the public's trust.

The bill proposes three categories of licensed social workers who must meet educational and examination requirements. The three categories include a "licensed bachelor social worker," "licensed master social worker," and "certified social worker." The "licensed bachelor social worker" must have a baccalaureate degree in social work from an accredited school of social work; the "licensed master social worker" and "certified social worker," a doctorate or master's degree in social work from an accredited school of social work. In addition to the educational qualification, the "certified social worker" must have 24 months of supervised post-master's experience. The "certified social worker" would include licensees who are practicing independently in the private practice of clinical social work or in a public or private agency or institution.

Licenses would have to be renewed every two years in compliance with requirements set by the board. The bill proposes that the continuing education requirements include a minimum of 60 hours every two years.

The bill provides a 24-month period for the grandfathering of those social workers who are engaged in the practice of social work. An applicant for licensure must have 24 months of social work experience within the three years prior to the effective date of the act in order to be exempt from academic and examination requirements.

The bill also authorizes the board to revoke a license, suspend a license, censure the licensee, issue a letter of reprimand, place a licensee on probationary status, refuse to renew a license, or revoke probation and impose other discipline. The grounds for disciplinary action include

gross negligence in performing services, engaging in unethical conduct, perpetrating fraud in obtaining a license, conviction of a crime related to the licensee's services, conviction of a felony, engaging in or permitting the performance of unacceptable services, mental incompetency, addiction to alcohol or other drugs, and other violations or unethical acts.

The bill further prohibits licensed social workers from disclosing information obtained from their clients except in some situations. The exceptions apply when: (1) a life threatening emergency exists which requires disclosure of information; (2) a client poses a serious danger or threat of violence toward another person; (3) suspected abuse or neglect of a minor or elderly adult exists; (4) a court of law orders the disclosure of information; (5) federal or state statutes require the disclosure of information; and (6) informed consent to release information has been obtained.

### **Analysis of Proposed Legislation**

**Summary of findings.** Our analysis of Senate Bill No. 2524 is based on criteria in the Sunset Law. In accordance with these guidelines, we find that regulation of social workers is not warranted. In summary, our findings are:

1. The practice of social work does not pose sufficient harm to warrant licensure.
2. Consumers of public and private social work services are not likely to be disadvantaged.
3. Licensing requirements restrict entry into the profession.
4. The impetus for regulation comes from social workers and not from the consumers.
5. The grandfathering clause is too restrictive.
6. Senate Bill No. 2524 contains other technical problems, including a defective licensing requirement and an unclear requirement for continuing education.

**No evidence of harm.** As noted in our 1986 sunrise report, the NASW-Hawaii Task Force on the Licensing of Social Workers, Committee on Verifying Abuse and Harm, contended that regulation is needed because social workers can abuse clients financially, psychologically, emotionally, and sexually.

We find no documented evidence that consumers have been harmed by incompetent or unethical social workers. NASW-Hawaii provided one case involving a social worker who sexually abused a client. However, this social worker was an employee of a federal government agency. Consequently, the case provided by NASW-Hawaii is not relevant to the issue at hand because federal employees would be exempt from licensing requirements under Senate Bill No. 2524.

As evidence of harm, NASW-Hawaii also provided the testimonies of five clients of the Family Court and Child Protective Services (CPS) presented at a Senate informational hearing.

In their testimonies, these clients complained about services provided and other actions taken by state social workers. These testimonies do not include any explanation of attempts by the clients to bring the complaints to the attention of the agencies involved or if their complaints had been substantiated or resolved by the agencies. It is possible, therefore, that some or all of the reported harm may not have been the fault of individual social workers but actually may have been caused by other problems within the agencies. For example, there are indications that problems in the Department of Human Services' CPS units may be related to understaffing of the units and the resultant heavy caseloads imposed on CPS social workers.<sup>7</sup>

According to the Office of Consumer Protection and the Office of the Ombudsman, no complaints have been made against social workers in Hawaii in the past three years. In our 1986 sunrise analysis of the proposal to license clinical social workers, we concluded on the basis of evidence then available that there is no justification for the State to regulate social workers. No new evidence has come to light that would lead us to conclude otherwise about the present need to license social workers.

**Consumers are not disadvantaged.** Clients of social workers are not disadvantaged in relation to being protected against incompetent social work practice. In public and private agencies or institutions, there appear to be adequate controls over the recruitment and supervision of social workers.

For instance, the competence and supervision of employees in public agencies in Hawaii are addressed through the classification system, minimum qualifications, laws, rules and regulations. The state classification system for the social worker series includes seven levels (i.e., Social Worker I, II, III, IV, V, VI, VII). The scope of duties, degree of knowledge, and abilities required are established for each social worker level. Adequate supervisory positions to oversee the social workers responsible for direct services are provided within the social worker series. Applicants for state social worker positions must meet minimum educational and experience requirements. The public is also protected by certain provisions in the civil service laws and rules and regulations. The state agencies are given the authority to conduct performance ratings of its employees, take disciplinary actions against employees, and provide in-service training programs.

Clients of public and private agencies or organizations are also provided recourse if they feel they have been treated inadequately or improperly. They can complain directly to the social worker's supervisor or agency administrator.

Seventeen out of the 42 states which regulate the social work profession exempt public employees from licensing. Some states also exempt private nonprofit organizations. In a 1986

sunset report, for example, the governor of Illinois recommended that the licensing law be revised to exempt social workers employed by the government and nonprofit organizations from regulation.<sup>8</sup>

In a meeting with the NASW-Hawaii, the affected state departments requested that Senate Bill No. 2524 be amended to exempt state government social workers from the licensing requirements. The departments were mainly concerned with the effects that licensing would likely have on recruitment of social workers. As a result of this meeting, the NASW-Hawaii has agreed that government social workers should be exempted from coverage under this bill.<sup>9</sup>

As noted in our 1986 sunrise report, clients who obtain services from private, independent practitioners are primarily in the middle and upper classes. Hence, they are persons who are able to pay for the services, who are not disadvantaged, and who are able to exercise considerable judgment in availing themselves of such services. Thus, there is no need to protect these clients against incompetent or unethical social work practice.

**Licensing requirements restrict entry into profession.** The licensing requirements in Senate Bill No. 2524 demand academic degrees in social work. Individuals with other types of degrees and experience in the social work field do not qualify for licensure. A person licensed as a “licensed bachelor social worker” must have a baccalaureate degree in social work. A “licensed master social worker” is required to have a doctorate or master’s degree in social work. A third level is the “certified social worker” who must meet the same educational requirements in addition to experience requirements.

Currently, the minimum qualification requirements in Hawaii for the social worker positions in the state government permit individuals with bachelor’s degrees in fields other than social work to enter into the profession. A person with a bachelor’s degree must have a minimum of 12 semester credit hours in such courses as psychology, sociology, or other related social sciences. Applicants with a bachelor’s degree also must have social work experience for the advanced trainee level and above. Although they may have had social work experience, these individuals would not qualify for a license and could not apply for any social worker position under Senate Bill No. 2524.

State agencies hire individuals with bachelor’s degrees in psychology, sociology, and other fields. We conducted a survey of the social worker III’s in the Department of Human Services (DHS) and Department of Health (DOH) to determine the type of degrees they had when they were initially hired in a state social worker position. A total of 79 social workers responded to our survey. These responses showed that 36 social workers, or 45 percent of the total, had bachelor’s or master’s degrees in other fields. The remaining 43 social workers had bachelor’s or master’s degrees in social work.

Under the grandfathering clause in Senate Bill No. 2524, all those social workers with non-social work degrees would become licensed provided they meet the experience requirement. However, after the two-year exemption period is over, all applicants for licensure would have to have a bachelor's or master's degree in social work.

Faced with an already existing shortage of social workers, despite the employment of many persons with degrees in fields other than social work, the affected departments anticipate that their recruitment problem will become much more severe if licensing of state social workers is required. At the time of our study, DOH and DHS had 135 vacancies out of 473 social worker positions, or a 28 percent vacancy rate. Some of the vacant positions were filled by emergency hires who are appointed to temporarily fill positions for 30-day periods and are not required to meet the minimum qualification requirements for the position.

The validity of requiring a social work degree over other types of educational and experience requirements is questionable. Some states as well as Puerto Rico and the Virgin Islands permit individuals with non-social work degrees to be licensed for certain levels of social workers. Applicants for licensure with non-social work degrees must also have two years of social work experience in some states.

A study of the minimum qualifications for social service jobs in Maryland compared the overall performance of employees in different educational categories and concluded that "MSWs overall are performing more effectively in State social services than non-MSWs" but further stated that "this analysis does not imply that other employees are not performing effectively."<sup>10</sup> The study also found when comparing performance on specific tasks that on most tasks "employees with a bachelor's degree in a field other than social work perform as effectively as employees with a BSW, or an MSW."<sup>11</sup> MSW's performed significantly better than non-MSW's in only 17 out of the 102 social service tasks.

According to our 1986 sunrise report, there is little relationship between the competence of a practitioner and academic degrees or grades. Experience and certain personality characteristics can also contribute to the effectiveness of a practitioner. Thus, the type of degree held may not be the only factor which affects the competence of a social worker.

**Licensing will benefit the profession.** Benefit to social workers, and not the protection of the consumers, provides the main impetus behind the drive to license social workers. As noted in our 1986 sunrise report, NASW has actively pursued the legal regulation of the profession to promote public recognition and accomplish "vendorship" or third-party reimbursements.

Nineteen states have provided legal recognition of clinical social workers as independent providers of mental health services under health insurance policies. Eleven of the mandated

benefits laws became effective between 1985 and 1988. In all states, a clinical social worker must be licensed in order to receive third-party reimbursements.<sup>12</sup>

Evidence shows that the benefit of licensure is significant for the profession. A four-year study of 60,000 Blue Shield subscribers in several communities found that social workers who no longer have to process their claims through a psychologist or psychiatrist as a result of licensure have greatly expanded their share of the market. More clients are seeking the services of social workers to the extent that psychologists and psychiatrists are beginning to see a decrease in their clientele.<sup>13</sup> The ability to receive third-party reimbursements and the potential increase in clientele greatly reinforce the social workers' desire to obtain licensure.

The impetus for enacting licensing laws should not be to meet the requirements for reimbursements. However, this is what often happens. The Council of State Governments concludes:

“Mandatory reimbursement to a range of practitioners offers the consumer more choices for receiving health care to the extent that lower-cost practitioners are substituted by consumers for higher-priced practitioners. Frequently, however, the insurance laws may refer to ‘licensed’ health care practitioners as a necessary requirement for reimbursement. This requirement places a heavy burden on state legislators to enact new licensing statutes (and create additional state regulatory structures) for the many currently unlicensed behavioral science professions and allied health occupations.”<sup>14</sup>

A license, however, is not the only prerequisite available for determining eligibility for third-party reimbursements. For example, under the Federal Employees Health Benefits Program, clinical social workers may qualify in several ways to receive reimbursements for services covered under the health insurance contracts for federal employees. To be qualified under this program, a clinical social worker must either be licensed or certified by the state in which that individual practices, be certified by a national professional organization, or meet equivalent requirements established by the U.S. Office of Personnel Management.<sup>15</sup>

Since Hawaii does not license clinical social workers, the Hawaii Medical Service Association (HMSA) requires that they be certified by the NASW. One of the requirements for NASW certification is membership in NASW. A social worker is no longer qualified to receive reimbursements upon the termination of membership in NASW.

NASW-Hawaii feels that HMSA's use of certification by NASW is an inappropriate means of providing regulation because a social worker can terminate membership with NASW before any action is taken and become exempt from any disciplinary action by NASW.<sup>16</sup> This point is inconsequential because a social worker would become disqualified to receive reimbursements

from HMSA upon termination of membership with NASW. The ability to take disciplinary action against a social worker is not needed to regulate eligibility for reimbursements. Licensing, therefore, should not be for the purpose of meeting requirements for third-party reimbursements and benefitting the practitioners, but rather should be aimed primarily at protecting consumers.

**Restrictive grandfathering clause.** Senate Bill No. 2524 provides for the grandfathering of social workers who are already engaged in the practice of social work. The grandfathering clause provides for a 24-month period in which applicants for licensure will be exempted from all academic and examination requirements. Such applicants, however, must have had 24 months of social work experience within the three years *prior* to the effective date of the act and must be currently engaged in the practice of social work.

The grandfathering provision is too restrictive for two reasons. *First*, the 24-month period in which individuals may apply for a license may not be sufficient time for the board to set up and license all the social workers currently engaged in the practice. According to NASW, there are 2,400 social workers in Hawaii in both the public and private sectors who would need to be licensed. If the bill should be enacted in its present form, setting up a new board, adopting necessary rules and regulations, and putting procedures into operation for this number of applicants can be quite time consuming.

*Second*, some social workers will not qualify under the grandfathering clause. For example, a person in a social work position who is a recent college graduate and has less than two years of experience within three years prior to the act will not qualify under the provision. The experience obtained during the 24-month implementation period would not count because it would be within the period after, rather than before, the act becomes effective. This situation might apply to a social worker employed by the State who is appointed to a journeyworker level position within less than six months prior to the act. If this person has a non-social work bachelor's degree, the minimum qualifications require that applicants have at least one and a half years of social work experience. Hence, the person would still be short of the two-year experience requirement under the bill. Similarly, a person with a master's degree in social work is not now required to have any social work experience for the journeyworker level. Thus, an MSW with less than two years of experience would not qualify under the grandfathering clause.

**Defective requirements for licensure.** Senate Bill No. 2524 further requires applicants for licensure to be U.S. citizens or legal resident aliens and be at least eighteen years of age. These requirements are defective and unnecessary. Citizenship requirement has been found to be unconstitutional. The age requirement is unnecessary taking into account the educational requirements. The applicant is already required to have a bachelor's or master's degree in social work and should be able to meet the age limit.

**Continuing education requirement is unclear.** The bill also authorizes the board of social work examiners to establish continuing education requirements. The requirements must include a minimum of 60 hours for a two-year period. It is not clear how the hours will be counted. The 60 hours may refer to instructional, clock, or academic credit hours which can vary quite widely.

The NASW recommends a minimum of 90 hours of continuing education over a three year period. Three broad categories of continuing education activities are established with a minimum number of instructional hours or clock hours for each category.<sup>17</sup> For purposes of clarity and consistency, such a requirement should be as precise as possible if it is going to be imposed.

### **Conclusion**

The purpose of licensing is to protect the consumer by establishing minimal standards for practice in an occupation. Unless there is a preponderance of evidence showing that consumers are disadvantaged or harmed by practitioners in the occupation, licensure is unwarranted.

We do not find sufficient evidence of consumer complaints or cases of damage involving social workers in Hawaii to warrant regulation. Consumers of social work services in the public and private sector are not disadvantaged. Licensure would benefit the profession more than protect the public.

Based on our analysis, we conclude that regulation of social workers does not meet the criteria of the Sunset Law.

### **Recommendation**

*We recommend that Senate Bill No. 2524 not be enacted.*



## NOTES

1. Armando Morales and Bradford W. Sheafor, *Social Work: A Profession of Many Faces*, Massachusetts, Allyn and Bacon, 1977, pp. 37-38.
2. *Ibid.*, pp. 40-42.
3. U.S., Bureau of Labor Statistics, *Occupational Outlook Handbook: 1988-89 Edition*, Washington, D.C., U.S. Government Printing Office, April 1988, p. 102.
4. NASW Task Force on Sector Force Classification, *NASW Standards for the Classification of Social Work Practice, Policy Statement 4*, Silver Spring, Maryland, National Association of Social Workers, Inc., September 1981, p. 6.
5. National Association of Social Workers, *Annual Report 1987*, Silver Spring, Maryland.
6. National Association of Social Workers, "State Comparison of Laws Regulating Social Work", Silver Spring, Maryland, April 1988. Note: In addition to the 42 states, Alaska also recently enacted legislation to license social workers.
7. Greg Wiles, "Social Worker Protest Called Off," *Honolulu Advertiser*, May 26, 1988, p. A-3.
8. Illinois, Bureau of the Budget in conjunction with Department of Registration and Education, *Governor's Sunset Report on the Social Workers Registration Act*, Springfield, March 1986.
9. Interview with Kenneth Lee, President, National Association of Social Workers-Hawaii Chapter, April 14, 1988.
10. Booz-Allen and Hamilton, Inc., *The Maryland Social Work Services Job Analysis and Personnel Qualifications Study*, January 1987, p. III-10.
11. *Ibid.*, p. III-12.
12. National Association of Social Workers, "State Comparison of Laws Regulating Social Work", Silver Spring, Maryland, April 1988, Table 4.
13. June Gary Hopps and Elaine B. Pinderhughes, "Profession of Social Work: Contemporary Characteristics," *Encyclopedia of Social Work*, 18th ed., Vol. 2, 1987, p. 361.
14. The National Clearinghouse on Licensure, Enforcement and Regulation and The Council of State Governments, *State Credentialing of the Behavioral Science Professions: Counselors, Psychologists and Social Workers*, Lexington, Kentucky, 1986, p. 33.

15. Public Law 99-251.
16. Testimony on Senate Bill No. 2524 presented by Kenneth W.Y. Lee, President, National Association of Social Workers, Inc.-Hawaii Chapter, no date.
17. NASW Task Force on Standards for Continuing Professional Education, *NASW Standards for Continuing Professional Education*, Silver Spring, Maryland, National Association of Social Workers, Inc., June 18, 1982, p. 8.