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# Sunset Evaluation Report: Social Workers

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

Submitted by

**THE AUDITOR**  
STATE OF HAWAII

Report No. 91-16  
November 1991

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## Foreword

Hawaii's Sunset Law, or the Hawaii Regulatory Licensing Reform Act of 1977, schedules regulatory programs for termination on a periodic cycle. Unless specifically reestablished by the Legislature, the programs are repealed. The auditor is responsible for evaluating each program for the Legislature prior to the date of repeal.

This report evaluates the regulation of social workers under Chapter 467D, Hawaii Revised Statutes. It presents our findings as to whether the program complies with policies in the Sunset Law and whether there is a reasonable need to regulate social workers to protect the health, safety, and welfare of the public. It includes our recommendation on whether the program should be continued, modified, or repealed.

We acknowledge the cooperation and assistance of the Department of Commerce and Consumer Affairs and other state officials contacted during the course of our examination. We are also grateful for the assistance of the local chapter, Minnesota chapter, and national office of the National Association of Social Workers, regulatory agencies of other states, and other professional organizations and agencies involved with social work.

Newton Sue  
Acting Auditor  
State of Hawaii

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# Table of Contents

## Chapter 1 Introduction

The Social Work Profession .....	1
Regulation in Other States .....	2
Regulation in Hawaii .....	2
Objectives of the Evaluation .....	4
Scope and Methodology .....	5

## Chapter 2 Findings and Recommendations

Findings .....	7
Chapter 467D Is Not Necessary .....	7
Other Protections Are in Place .....	11
No Problems Found With Independent Practitioners ..	13
Employers Are Not Gathering Data on Complaints ....	13
Recommendation .....	14

Notes .....	15
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Response of the Affected Agency .....	17
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# Chapter 1

## Introduction

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The Sunset Law, or the Hawaii Regulatory Licensing Reform Act, Chapter 26H, Hawaii Revised Statutes, establishes policies for occupational licensing and schedules the repeal of licensing statutes according to a timetable. The law directs the auditor to evaluate each licensing statute prior to the repeal date and to determine whether the health, safety, and welfare of the public are best served by reenactment, modification, or repeal.

This report evaluates whether the regulation of social workers under Chapter 467D, HRS, complies with policies in the Sunset Law.

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## The Social Work Profession

Social work is one of the major helping professions. Chapter 467D defines the practice as involving the “application of social work principles, techniques and methods to treat and prevent psychosocial dysfunction, disability, or impairment, including emotional and mental disorders.”<sup>1</sup> Social workers provide a wide range of services—consultation, counseling, diagnosis, advocacy, case management, outreach, crisis intervention, social rehabilitation, and psychotherapy. Their clients include the young, the poor, the disadvantaged, the elderly, and the ill. They may work directly with clients or engage in policy, planning, or administration.

In 1988, social workers held approximately 385,000 jobs in the United States.<sup>2</sup> About two-fifths worked for state or local governments in departments of human resources, social services, mental health, health, housing, education, and corrections.<sup>3</sup> Those in the private sector were employed by social service or health care agencies and religious institutions. Some social workers were in private practice.

There are about 2500 social workers in Hawaii. In 1989, the state government, the largest single employer of social workers, employed approximately 850 in the departments of human services, health, corrections, and education, and in the Judiciary.<sup>4</sup>

The minimum requirement for most social worker positions is a bachelor’s degree in social work or in a related field such as psychology or sociology.<sup>5</sup> There are bachelor’s, master’s, and doctorate degree programs in social work. The U.S. Department of Education has designated the Council on Social Work Education the sole accrediting agency for social work education programs. In

Hawaii, two institutions offer accredited social work programs: Brigham Young University-Hawaii Campus has a bachelor's degree program, and the University of Hawaii at Manoa has bachelor and master's degree programs.

The National Association of Social Workers (NASW) is the major professional organization<sup>6</sup> with about 130,000 members in chapters throughout the U.S., Puerto Rico, the Virgin Islands, and Europe.<sup>7</sup> The Hawaii chapter has 647 members. The association's primary functions are to advance the practice of social work, establish professional standards, develop and promote social policy, and provide services to its members.

NASW offers social workers professional recognition through several credentialing programs. Upon meeting specified requirements, social workers can be certified as members of the Academy of Certified Baccalaureate Social Workers or the Academy of Certified Social Workers. Clinicians with post-master's degree experience can earn the credential of Qualified Clinical Social Worker.

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## Regulation in Other States

Social work is regulated by the District of Columbia, Puerto Rico, the Virgin Islands, and all of the states except for New Jersey and Wisconsin.<sup>8</sup> The nature and extent of regulation, however, varies considerably. Some jurisdictions regulate all social workers; others, only a particular kind of practitioner, such as social workers in clinical practice. Some states require a license to practice while others restrict only the title of social worker. Most states limit their scope of regulation by exempting large groups of social workers, such as federal, state, institutional, and agency employees.

Thus, even with regulation, access to the profession is not strictly limited to trained professional social workers. The National Center for Social Policy and Practice, a research agency affiliated with NASW, reported in 1989 that "the preponderance of service in public welfare settings historically has been and continues to be delivered by personnel not trained as professional social workers."<sup>9</sup>

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## Regulation in Hawaii

Various forms of regulation for social workers have been proposed to the Legislature since 1975. The chief proponent of regulation has been the Hawaii chapter of the NASW. In 1984 the Legislature amended the Sunset Law to require a sunrise analysis by the auditor of any proposal to regulate professions and occupations.<sup>10</sup> The auditor conducted sunrise analyses of proposals to regulate clinical social

workers in 1985 and again in 1987. In both instances the auditor concluded that regulation was not warranted.

### ***Creation of temporary regulatory program***

In 1989, the Legislature enacted Chapter 467D as a temporary program primarily to develop information on the need for regulation. It gave the Department of Commerce and Consumer Affairs (DCCA) broad authority to receive and investigate complaints about social workers so that the department could gather data on abuses. In a committee report the Legislature declared:

Your Committee recognizes that it is unusual to allow the Department of Commerce and Consumer Affairs to receive complaints, investigate and prosecute even individuals who are not required to be registered. However, your Committee believes this unique authority is warranted on a temporary basis in this case because there appears to be no hard data available to determine whether or not there are sufficient abuses by social workers to warrant a full licensure program. The intention of this provision is to allow for the temporary handling of complaints and collection of data by the Department of Commerce and Consumer Affairs, so that information regarding this controversial area will be available for consideration in the Legislative Auditor's sunset review of the regulatory chapter established by this measure.<sup>11</sup>

The Legislature made Chapter 467D effective as of January 1, 1990, and provided for its sunset review by scheduling it for repeal as of December 31, 1992.<sup>12</sup>

### ***Request for employers to gather complaints information***

In addition to having DCCA gather data, the Legislature, in a conference committee report, also asked employers to collect information about complaints:

Your committee also would like the appropriate employing agencies to maintain, for a three-year study period, records of complaints received directly, in order to have information on the universe of complaints received.<sup>13</sup>

### ***Voluntary registration***

Chapter 467D differs from other regulatory laws by offering minimal regulation—voluntary registration. To be registered, a person must have a master's degree in social work from a school of social work accredited by the Council on Social Work Education. The director of DCCA may deny registration for applicants who have been convicted of a crime, declared mentally incompetent by a court, or for findings of any of the causes listed in the statute. Unregistered persons are prohibited from using the title "Registered Social Worker" or otherwise indicating that they are registered social workers. As of

April 1991, DCCA had received applications from 101 social workers. All but one had been accepted; the one application returned was from a graduate of a Canadian school not accredited by the Council.

### ***Exemptions***

Persons exempted from regulation are students in an accredited course of social work; any ordained or authorized person of a religious denomination; any officer or employee of the United States officially engaged in the practice of social work; and other licensed, registered, or certified professionals provided they do not hold themselves out to the public as social workers.

### ***Prohibited practices***

Chapter 467D also gave DCCA authority to discipline both those who register as social workers and those who do not. DCCA may accept and handle complaints against any person who engages in “the practice of social work.”<sup>14</sup> The director has the power to accept, investigate, prosecute, and hear complaints in such areas as:

- unfitness or incompetence;
- habitual intemperance, addiction or dependency on alcohol or other substances;
- using the title “Registered Social Worker” when not registered or when registration is suspended or revoked;
- dishonorable, unethical, or unprofessional conduct;
- having disciplinary action imposed in another state;
- sexual conduct in connection with professional services or activities; and
- revealing confidential information.

Those accused are given the opportunity for a hearing according to Chapter 91, HRS, the Administrative Procedure Act. The director may assess a fine of not less than \$100 nor more than \$5,000 for each offense, and may also bring civil proceedings to enjoin persons for any of these violations.

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### **Objectives of the Evaluation**

This evaluation sought to determine whether the regulation of social workers complies with policies in the Sunset Law. Specific objectives were to:

1. Determine whether there is a reasonable need to regulate social workers to protect the health, safety, and welfare of the public;
2. Determine whether current regulatory requirements under Chapter 467D are appropriate for protecting the public;
3. Establish whether the regulatory program is being implemented effectively and efficiently; and
4. Make recommendations on these issues.

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## Scope and Methodology

To accomplish the objectives, we reviewed information on professional and occupational regulation, the regulation of social workers in other states, and other related issues including evidence of abuse and harm by social workers. We sought information from other states, NASW, the National Center for Social Policy and Practice, the American Association of State Social Work Boards, and the Council on Social Work Education.

In Hawaii, our sources were the DCCA's Regulated Industries Complaints Office, and its Professional and Vocational Licensing Division. We also contacted public and private social service and health agencies that employ social workers, the Office of Consumer Protection, the Office of the Ombudsman, the Protection and Advocacy Agency of Hawaii, the University of Hawaii's School of Social Work, the Hawaii chapter of NASW, and CHAMPUS, the medical insurance program for military dependents.

Our evaluation covered DCCA's regulatory activities under Chapter 467D from January 1990 through April 1991.



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# Chapter 2

## Findings and Recommendations

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This chapter contains the results of our evaluation of Chapter 467D and our recommendations on whether to reenact, modify, or repeal the chapter. It also reports on the status of the three-year study of complaints on social workers requested by the Legislature in 1989.

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### Findings

1. The regulation of social workers is not warranted. There is little evidence of actual harm and Chapter 467D is not sufficiently related to protecting the public.
2. Other protections against potential harm already exist in both the public and private sector.
3. Data on complaints against social workers are sparse--employers were unaware of the Legislature's request to gather this information.

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### Chapter 467D Is Not Necessary

Under the criteria in Hawaii's Sunset Law, regulation is not warranted. The Sunset Law says that regulation of a profession should be imposed only when necessary to protect the public health, safety, and welfare. It provides further that evidence of abuses is to be given great weight in determining whether regulation is desirable.<sup>1</sup> We found, however, little evidence of actual abuse by social workers, and we found it difficult to gauge the seriousness of potential harm.

The regulatory scheme set forth by Chapter 467D will do little to protect most consumers from a practice that includes such a wide range of services. Registration will not prevent ethical and professional violations, and the minimum qualifications standards are not a guarantee that the consumer will receive a needed service. The title protection proffered by the law will not affect most consumers.

### *Little evidence of abuse*

The Department of Commerce and Consumer Affairs, charged by Chapter 467D to receive complaints about alleged abuses by social workers, has attracted few complainants and uncovered virtually no evidence of harm by social workers. During calendar year 1990, the

first year of the program under Chapter 467D, only four complaints on social workers were filed with the department's Regulated Industries Complaints Office (RICO). As of late April 1991 of the second year, no complaints had been received. Three of the four complaints resulted from child custody disputes, the fourth related to alleged child abuse. The four complaints involved four different social workers: a social worker at the Department of Human Services, a social worker for the Judiciary, and two independent practitioners. Only one of the four social workers was registered with DCCA.

In three of the cases (two custody disputes and the alleged child abuse case), RICO found that the allegations against social workers were not substantiated by the evidence. The last case, also involving custody, was closed because the complainant apparently moved out of state after making the complaint.

RICO's information runs counter to claims by proponents of regulation that harm is widespread. In arguing for regulation in 1989, social workers and others testified that many of those harmed by social workers had no satisfactory avenue of appeal. One person testified that she knew of 150 complaints over a two-year period.<sup>2</sup> The National Association of Social Workers cited 80 reports from Hawaii members of unethical or incompetent conduct by fellow social workers.<sup>3</sup>

### **Complaints information largely anecdotal**

There is little documented evidence of actual harm, both nationally and in Hawaii. The National Association of Social Workers (NASW) provided anecdotal information obtained from two surveys--one of members in Hawaii<sup>4</sup> and another of members in Minnesota.<sup>5</sup> But the responses to the surveys were anonymous and had not been verified. NASW also provided statements from a Hawaii Family Court hearing in 1988 and from legislative hearings in 1989. These also were anecdotal and inconclusive.

The NASW national office maintains statistics only on the number of complaints received and had no data available on cases sustained. The Hawaii chapter has not received any formal complaints in the past six years.

We requested information from other states with various regulatory schemes but could not draw conclusions. Some states gave summaries of the nature and number of complaints *received* by their regulatory agencies, but most provided little information on those *sustained*.

In Hawaii, various state administrators, the ombudsman, and the Protection and Advocacy Agency of Hawaii reported receiving complaints against social workers but did not have data available. The Department of Public Safety keeps summary logs of inmate grievances but these were too brief to be useful.

### **Potential harm difficult to gauge**

In the absence of supportable data on actual harm, the advocates of regulation have argued the *potential* for harm that social workers could cause. And indeed, some states regulate social workers on the basis of potential harm. Potential harm is attributed to the dependent nature of the social worker-client relationship, the vulnerable state of clients, and the importance of the social workers' decisions. Harm, it is argued, *could* occur for various reasons, such as error, poor judgment, neglect, incompetence, and other detrimental actions.

We believe, however, that the lack of data on actual harm makes it difficult to determine whether the potential for harm is sufficiently serious to warrant regulation. In any event, the likelihood of potential harm will not be removed by the current registration program and the provisions on prohibited acts of Chapter 467D.

### ***Ethical and professional violations not deterred***

Supporters of regulation see the exercise of the state's police power as a way of preventing unethical and unprofessional practices and protecting the public from proven violators. But statutory prohibitions have not been a deterrent; these violations continue in states that have regulation.

For example, California's Board of Behavioral Science Examiners reported 20 cases of wrongdoing by California social workers that were upheld between 1984 and 1990.<sup>6</sup> Nineteen of these involved unethical and/or dishonest or criminal acts by Licensed Clinical Social Workers (LCSW). Sexual misconduct occurred in ten of those cases. In California, the LCSW is required to have a masters degree in social work (MSW) and two years of experience to obtain licensure.<sup>7</sup> Licensure, the most restrictive form of regulation, did not prevent these violations.

Regulation of social work, it has been argued, would prevent those known to have committed proscribed or harmful acts from continuing to practice. This would be accomplished by revoking their licenses and other sanctions. However, revoking a social worker's registration, certification, or license would not prevent that person from practicing in a related field under another title such as child and family counselor or marriage counselor.

***Need for professional social work education not established***

Occupational and professional regulation generally restrict entry with minimum qualifications such as satisfying education and training requirements and passing an examination. The social work profession contends that social work education is essential to competent, effective performance and that the absence of this education could lead to public harm. There is little evidence to support this.

In fact, recent studies have concluded that the value of a social work education for delivering competent social services is still in question. The National Center for Social Policy & Practice, the research and analysis arm of the NASW, after an extensive review of the literature from 1979 to 1989, found that data were not available to support the NASW's campaign to require a professional social work education for public social service positions.<sup>8</sup> It noted an absence of valid empirical data on the key issue of whether a social work degree should be required for job entry or promotion. After finding valid and reliable measures of the effectiveness of a social work education to be scarce, the center concluded that more evidence was needed to "demonstrate that social services delivered by professionally trained social workers are more effective and in the long run more efficient than those provided by others."<sup>9</sup>

It should be noted that the center undertook the study in order to counter the movement to open social service positions to those without social work education.

A more recent study comparing social workers by educational degree found that ratings differed depending on the measure used. For example, those with MSWs were rated lower than those with other degrees (for instance, a bachelor of arts) when evaluated for quality assurance, but scored highest in a merit examination and in ratings from supervisors.<sup>10</sup>

This study and others indicate some of the benefits of social work education in public social service work, but are not sufficient to justify requiring a professional social work education for all social work positions. None of the studies have concluded that other related education and training is inadequate. Nor have they shown that the absence of a social work education leads to harm.

***Public not protected by regulating title***

Chapter 467D establishes a voluntary registration program that enables social workers to register with the State and to use the title of "Registered Social Worker." The primary effect is to give title protection to certain social workers by prohibiting others from using that title. Here, title protection benefits the titleholder, not necessarily the consumer.

**No effect on majority of consumers**

Registration will not affect the majority of consumers of social work services, most of whom are clients of the State or other human service agencies. These consumers do not choose their practitioners but are assigned to social workers in the agencies' employ. For this reason, registration does not have a direct bearing on these consumers.

**Little help for other consumers**

The title does not provide enough information for those consumers who seek the services of a social worker in private practice. "Registered Social Worker" means only that a person has a master's degree in social work from an accredited school of social work. Because the field is so varied, the consumer still has to determine whether a social worker is qualified in a specific field, such as counseling or group work. Registration will not inform the consumer of the practitioner's skills, specialized training, and expertise.

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**Other Protections  
Are in Place**

We find that protections are already in place in both the public and private sector to protect consumers of social work services.

***Public sector  
protection***

The State, which serves the largest number of consumers of social work services, requires its social workers and other employees to meet certain standards. These include minimum qualifications for the position, screening and hiring practices, supervisory control, and regular monitoring and evaluation. The State also has procedures to inform the public of its rights and to allow for complaints.

**Office of the Ombudsman**

The ombudsman has broad jurisdiction to investigate the acts of state government. A permanent legislative service agency established by Chapter 96, HRS, the ombudsman investigates administrative acts which may be contrary to law; unreasonable, unfair, oppressive, or discriminatory; based on a mistake of fact; based on improper or irrelevant grounds; unaccompanied by an adequate statement of reasons; performed in an inefficient manner; or that are otherwise erroneous.<sup>11</sup>

The ombudsman reports opinions and recommendations to the agency and may publish them as well. The ombudsman must notify the complainant of the actions taken by both the ombudsman and the

agency. If the ombudsman believes there has been a breach of duty or misconduct by an employee, the matter is referred to the appropriate authorities.

### **Protection and Advocacy Agency of Hawaii**

The Protection and Advocacy Agency of Hawaii was established to provide legal services, information and referral services, and technical assistance to the mentally ill, the developmentally disabled, and those with other disabilities. The agency, a nonprofit public interest corporation, was mandated by federal law in 1975 and later acts. It is supported primarily by state and federal grants and serves aggrieved persons in both the public and private sectors. It monitors the care and treatment of clients by working with such agencies as the Hawaii Centers for Independent Living and the Department of Health's Medical and Facilities Licensing Branch, Waimano Training School and Hospital, and Developmental Disabilities Division.

## ***Private sector protection***

In the private sector, most social workers are employed in human service agencies, including many non-profit agencies, and in hospitals. Some are independent practitioners in private practice. Avenues of recourse are already available to clients who use their services.

### **Office of Consumer Protection**

The Office of Consumer Protection serves the consuming public of Hawaii. It is empowered to investigate reported violations of consumer laws and regulations and to seek enforcement by civil action on behalf of consumers. It can recommend new laws in the consumers' interest, conduct consumer education programs, appear on behalf of consumers before governmental boards and commissions, and be a clearinghouse of consumer complaints. It can make its complaints records available to the public.<sup>12</sup>

### **Human service agencies and hospitals**

Private human service and health agencies also take measures to ensure that they provide services appropriately. They have qualification requirements, screening and hiring procedures, and supervisory mechanisms. Some human service agencies are also subject to government regulation. (Child care institutions, for example, must conform to certain requirements for licensure.) These agencies may be governed by the conditions of federal grants and state purchase-of-service agreements.

Hospitals and long-term care facilities are also governed by standards imposed by the industry and government. Requirements for social work personnel have been established by the Joint Commission on the Accreditation of Healthcare Organizations, which accredits hospitals and nursing homes, the federal Medicare program, and the State's licensing program for hospitals, skilled nursing and intermediate care facilities.

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## **No Problems Found With Independent Practitioners**

There are fewer controls on the activities of independent practitioners because they operate without the supervision or the oversight of an employing agency. However, we found no indication that Hawaii consumers are in danger from these practitioners. Most reported complaints have concerned social workers employed by state agencies. Only two complaints were made at RICO against independent practitioners and neither was upheld. Both cases concerned custody disputes, a situation where the judge and attorneys already provide for the rights and protection of the parties involved.

The extent and nature of independent social work practice in Hawaii are largely unknown. There is no complete listing of these practitioners. The telephone directory for the island of Oahu for 1991-1992 contains only three listings under "Social Workers" in its yellow pages. NASW estimates that there are over a hundred independent practitioners based on information from CHAMPUS in 1988. However, CHAMPUS reported in April 1991 that there were only 37 social workers certified as Hawaii CHAMPUS providers.

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## **Employers Are Not Gathering Data on Complaints**

Public and private agencies contacted for this evaluation were unaware of the Legislature's request to collect complaints over a three-year period. The request, made to "the appropriate employing agencies," appeared in a conference committee report on the legislation that established Chapter 467D. The request did not assign responsibility for informing the agencies nor make clear which agencies were deemed "appropriate."

The Department of Public Safety has been gathering data on complaints, but not specifically in response to this legislation. The department maintains a computerized record of inmate grievances and can retrieve some information on complaints against social workers. Information, however, is not sufficiently detailed to allow a clear determination of the disposition of cases and whether harm has indeed occurred.

All other departments did not have data relevant to this study. Most agencies reported that they did not have an information system to collect such data and would have to create a suitable one.

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## **Recommendation**

We recommend that the Legislature allow Chapter 467D to be repealed as scheduled and not regulate social workers.

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# Notes

## Chapter 1

1. Chapter 467D, HRS.
2. U.S., Department of Labor, Bureau of Labor Statistics, *Occupational Outlook Handbook*, Bulletin 2350, 1990-91 ed., April 1990, p. 116.
3. Ibid.
4. Hawaii, Legislative Auditor, *Study of the Social Worker Shortage Among State Agencies*, Report No. 90-12, Honolulu, February 1990, p. 14.
5. *Occupational Outlook Handbook*, p. 116.
6. *Encyclopedia of Social Work*, vol. 2, 18th ed., Silver Spring, Md., National Association of Social Workers, 1987, p. 331.
7. National Association of Social Workers, Inc., *NASW 1990 Annual Report*, Silver Spring, Md., 1990, p. 4.
8. National Association of Social Workers, *State Comparison of Laws Regulating Social Work*, Silver Spring, Md., May 1990.
9. National Center for Social Policy and Practice, *Social Workers in Public Social Services, A Review of the Literature*, Silver Spring, Md., June 1989, p. 7.
10. Act 156, SLH 1984.
11. House Standing Committee Report No. 1263 on Senate Bill No. 424, Senate Draft 1, House Draft 1, Regular Session of 1989, p. 3.
12. Sections 2 and 3, Act 213, SLH 1989.
13. Senate Conference Committee Report No. 125 on Senate Bill No. 424, Senate Draft 1, House Draft 1, Conference Draft 1, Regular Session of 1989, p. 2.
14. Section 467D-6(b), HRS.

## Chapter 2

1. Section 26H-2(4), HRS.
2. Testimony on Senate Bill No. 424 submitted by Jean E. Pickering, to Representative Mazie Hirono, Chair, House Consumer Protection Committee, March 21, 1989.
3. Testimony on House Bill No. 443 submitted by Sharlene Furuto, President, National Association of Social Workers Hawaii Chapter, 1989 Regular Session.
4. National Association of Social Workers Hawaii Chapter, *Supplemental Reference Packet to the Unabridged Rebuttal to the Sunrise Analysis Update of a Proposal to Regulate Social Workers Report No. 88-16, November 1988, December 1988*, pp. C1-C5.
5. *Ibid.*, pp. E10-E15.
6. California, Department of Consumer Affairs, Board of Behavioral Science Examiners, *Disciplinary Actions Publications List*, for the years 1984, 1985, 1986, 1987, 1988, 1989, and 1990.
7. National Association of Social Workers, *State Comparison of Laws Regulating Social Work*, Silver Spring, Md., May 1990.
8. National Center for Social Policy and Practice, *Social Workers in Public Social Services, A Review of the Literature*, Silver Spring, Md., June 1989.
9. *Ibid.*, p. 17.
10. Surjit Dhooper, David Royse, L. Wolfe, "Does Social Work Education Make A Difference?" *Social Work*, January 1990, pp. 57-61.
11. Section 96-8, HRS.
12. Chapter 487, HRS.

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## Response of the Affected Agency

### Comments on Agency Response

A preliminary draft of this report was transmitted on September 4, 1991, to the Department of Commerce and Consumer Affairs. A copy of the transmittal letter is included as Attachment 1.

The Department of Commerce and Consumer Affairs did not submit a response to the preliminary draft.

# ATTACHMENT 1

STATE OF HAWAII  
OFFICE OF THE AUDITOR  
465 S. King Street, Room 500  
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September 4, 1991

C O P Y

The Honorable Robert A. Alm, Director  
Department of Commerce and Consumer Affairs  
Kamamalu Building  
1010 Richards Street  
Honolulu, Hawaii 96813

Dear Mr. Alm:

Enclosed are three copies, numbered 6 through 8, of our draft report, *Sunset Evaluation Report: Social Workers*. We ask that you telephone us by Monday, September 9, 1991, on whether you intend to comment on our recommendations. If you wish your comments to be included in the report, please submit them no later than Friday, October 4, 1991.

The Governor and presiding officers of the two houses of the Legislature have also been provided copies of this draft report.

Since this report is not in final form and changes may be made to it, access to the report should be restricted to those assisting you in preparing your response. Public release of the report will be made solely by our office and only after the report is published in its final form.

Sincerely,

  
Newton Sue  
Acting Auditor

Enclosures