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**MARRIAGE AND FAMILY THERAPY,  
PROFESSIONAL COUNSELING, AND  
SOCIAL WORK EXAMINING BOARD**



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**Modifications From Agency**

December 13, 2019

Representative Patrick Snyder  
Chair, Committee on Children and Families  
State Capitol, Room 307 North  
P.O. Box 8953  
Madison, WI 53708

Senator Chris Kapenga  
Chair, Committee on Public Benefits, Licensing and State-Federal Relations  
State Capitol, Room 15 South  
P.O. Box 7882  
Madison, WI 53707

Dear Senator Kapenga and Representative Snyder,

Pursuant to s. 227.19 (4) (b) 2. the Assembly Committee on Children and Families requested the Marriage and Family Therapy, Professional Counseling, and Social Work Examining Board consider modifications to CR 18-098. The Marriage and Family Therapy, Professional Counseling, and Social Work Examining Board has reconsidered CR 18-098 and is submitting the following responses:

*1. The Committee has concerns that independent social workers are subject to higher training and education requirements to obtain the specialty as a substance abuse counselor, despite having more training and education under their social work license than an advanced practice social worker. According to Chapter MPSW 3, in order to become an independent social worker, one must first be an advanced practice social worker and obtain 3,000 hours of social work practice. Please reduce the training requirements for independent social workers to recognize the training and education that independent social workers would have through obtaining their credential. One possible option would be to put them in the category with advanced practice social workers. Alternatively, they could be their own category with lesser requirements.*

The Marriage and Family Therapy, Professional Counseling, and Social Work Examining Board made a germane modification to CR 18-098 by amending MPSW 1.09 (2) (title) and (intro) and (3) (title) and (intro) to read:

**MPSW 1.09 (2) Specialty Requirements for Individuals Certified as an Advanced Practice Social Worker or Independent Social Worker.** To be authorized to treat

substance use disorder as a specialty, an advanced practice social worker or an independent social worker shall meet all of the following:

**MPSW 1.09 (3) Specialty Requirements for Individuals Certified by the Board other than as Advanced Practice Social Workers or Independent Social Workers.** To be authorized to treat substance use disorder as a specialty an individual certified under s. 457.08 (1) ~~or (3)~~, 457.09 (1) or 457.14 (1) (a) ~~or (e)~~, Stats., shall meet all of the following:

*2. The Committee has concerns about the hours of education and supervised face-to-face substance use disorder treatment experience that is required for "Individuals Certified by the Board Other than as Advanced Practice Social Workers." The proposed rule requires 360 hours of education, compared to the previous rule, which required 180 hours. Additionally, the proposal requires 3,000 hours of face-to-face supervised contact, while previous requirements under MPSW 1.09 were 1,000 hours. We would like to see this modified to be at or less than previous requirements under MPSW 1.09. This would better align with the intent of the legislation, which was to make substance abuse counselors more accessible by increasing the substance abuse counselor workforce.*

The Marriage and Family Therapy, Professional Counseling, and Social Work Examining Board made a germane modification to CR 18-098 by amending MPSW 1.09 (3) (a) and (b) to read:

**MPSW 1.09 (3) (a)** A minimum of ~~360~~180 contact hours of substance use disorder education, which may be obtained within the bachelor or master's degree or in addition to the bachelor or master's degree. The education shall be in all of the following:

1. ~~Sixty~~ Thirty hours in assessment training.
2. ~~Sixty~~ Thirty hours in counseling training.
3. ~~Sixty~~ Thirty hours in case management.
4. ~~Sixty~~ Thirty hours in patient education.
5. ~~Sixty~~ Thirty hours in professional responsibility.
6. ~~Six~~ Three hours in boundaries and ethics.
7. ~~Fifty-four~~ Twenty-seven hours in electives in any of the subjects in subd. 1. to 6.

**(b)** A minimum of ~~3,000~~1,000 of hours of face-to-face substance use disorder treatment experience, under the supervision of a qualified supervisor, with individuals diagnosed with substance use disorders. The supervised hours can be either the same as or separate from the hours obtained for the credential issued by the board.

The Marriage and Family Therapy, Professional Counseling, and Social Work Examining Board is re-submitting the modified proposed rule to the Senate Committee on Public Benefits, Licensing and State-Federal Relations and the Assembly Committee on Children and Families.

Sincerely,

Kristin A. Koger

Chairperson

Marriage and Family Therapy, Professional Counseling, and Social Work Examining Board