

**Report From Agency**

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

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**IN THE MATTER OF RULEMAKING :  
PROCEEDINGS BEFORE THE :  
MARRIAGE AND FAMILY THERAPY, : REPORT TO THE LEGISLATURE  
PROFESSIONAL COUNSELING, AND : CR 19-138  
SOCIAL WORK EXAMINING BOARD :**

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**I. THE PROPOSED RULE:**

The proposed rule, including the analysis and text, is attached.

**II. REFERENCE TO APPLICABLE FORMS:**

N/A

**III. FISCAL ESTIMATE AND EIA:**

The Fiscal Estimate and EIA is attached.

**IV. DETAILED STATEMENT EXPLAINING THE BASIS AND PURPOSE OF THE PROPOSED RULE, INCLUDING HOW THE PROPOSED RULE ADVANCES RELEVANT STATUTORY GOALS OR PURPOSES:**

This rule removes the requirement that an applicant for licensure as a clinical social worker must complete the required 3,000 hours of supervised practice in no less than 2 years. Further, the rule establishes the number of face-to-face hours required for diagnosis and treatment of individuals based upon the Diagnostic and Statistical Manual of Mental Disorders (DSM), or its equivalent, at 600 hours.

**V. SUMMARY OF PUBLIC COMMENTS AND THE BOARD'S RESPONSES, EXPLANATION OF MODIFICATIONS TO PROPOSED RULES PROMPTED BY PUBLIC COMMENTS:**

The Marriage and Family Therapy, Professional Counseling, and Social Work Examining Board held a public hearing on December 10, 2019. The following people either testified at the hearing, or submitted written comments:

Mark Herstand, representing the National Association of Social Workers – Wisconsin Chapter

Michael P. Wallace  
Jerrold B. Rousseau  
Charles Zastrow

The Marriage and Family Therapy, Professional Counseling, and Social Work Examining Board summarizes the comments received either by hearing testimony or by written submission as follows:

The NASW of WI is opposed to Clearinghouse Rule 19-138 setting the required DSM treatment and diagnosis hours at 500, and recommends increasing it to 600 to ensure clinical social workers practicing in Wisconsin have adequate training to provide quality care to clients and to ensure the safety of all Wisconsin residents. The association does not believe 600 hours as opposed to 500 would be an impediment to mobility for out of state license holders.

Michael P. Wallace, Jerrold B. Rousseau, and Charles Zastrow either submitted written comments or provided oral testimony expressing the same viewpoint of the NASW of WI on their own behalf.

The Marriage and Family Therapy, Professional Counseling, and Social Work Examining Board explains modifications to its rule-making proposal prompted by public comments as follows:

The Board changed the required hours of DSM treatment and diagnosis from 500 to 600 in response to the public comments received.

**VI. RESPONSE TO LEGISLATIVE COUNCIL STAFF RECOMMENDATIONS:**

All of the recommendations suggested in the Clearinghouse Report have been accepted in whole.

**VII. REPORT FROM THE SBRRB AND FINAL REGULATORY FLEXIBILITY ANALYSIS:**

N/A