

2139 Silas Deane Highway
Suite 205
Rocky Hill, CT 06067
(860) 257-8066

Karen Bullock, Ph.D., LCSW
Stephen A Karp, MSW, Executive Director
naswct@naswct.net

Testimony on H.B. 6549: AAC The Department of Public Health's Oversight Responsibilities Relating to Scope of Practice Determinations for Health Care Professions

March 11, 2011

Submitted by: Stephen Karp, MSW, Executive Director

The National Association of Social Workers, CT Chapter is in general support of H.B. 6549. We appreciate the difficulty legislator's face in evaluating bills regarding professional scope of practice, especially as most legislators will not be members of the profession that the bill addresses. We feel that having a process in the front end before legislation is offered that requires professions to address issues of need and impact is a reasonable requirement that will hopefully lead to better legislation.

While we are in general support of the bill there are several sections where we strongly recommend the language be modified, as follows:

- **Section 1. (5):** We urge that the following language in italics be deleted: "*and the impact that the request will have on current regulatory oversight*". We do not believe that a profession can speak for the regulatory agency responsible for oversight as to the impact on that agency. We support such an impact analysis but it needs to come from the oversight agency, not the profession submitting the scope of practice.
- **Section 1. (11) (d):** We recommend that the time for a profession to respond to a posting of a proposed scope of practice be longer than the current deadline of October 1st. This only gives professions from September 15 to October 1 to respond to another profession's filing of a scope of practice. Most health care professions are represented by volunteer leadership and associations that have internal decision making processes for which a two-week turn around period is inadequate to fully digest another profession's proposal and to offer a substantial response. Not all professional associations even have full-time staff that can address a response. *We recommend a 30 day response period with an October 15th deadline.*

We want to note that this year's bill is an improvement over last year's version and especially appreciate this year's revisions to section 1 (8) that now limits the information to disciplinary action over the past five years, as recommended by NASW/CT in 2010.

Thank you for consideration of our comments and recommendations presented in this testimony.