

R277-306, Educator Preparation Programs for School  
Psychologists, Audiologists, Speech-Language Pathologists,  
Speech-Language Technicians, and Counselors.

Public Comment

As of December 18, 2019

**From:** Amber Hellstrand <[amhellstrand@wsd.net](mailto:amhellstrand@wsd.net)>  
**Sent:** Monday, November 4, 2019 8:55 AM  
**To:** Rawlings, Travis <[Travis.Rawlings@schools.utah.gov](mailto:Travis.Rawlings@schools.utah.gov)>  
**Subject:** School Social Worker License

Hello Mr. Rawlings,

My name is Amber Hellstrand and I am writing to support the continuation of the USBE School Social Worker license. I was informed at a recent conference that the state board is looking to discontinue this license. This is very upsetting to me since I have worked hard to ascertain this license and started planning for this while in graduate school. I am now about to apply for my level 2 license this year and it is unsettling that the license may be discontinued. Having an educator license is an important aspect of our professionalism and allows us the ability to meet other educators at their level and participate in their classrooms. This allows me access to legislative funds to procure supplies for my students and access to educator trainings. This also allows me to have fair access to pay/step increases in my salary. This license also sets standards for my job and allows me to be a part of the education system within which I work. Having standards as a profession is very important and will allow us to work toward creating social work evaluations and appropriately teaching/training other social workers that come into the schools.

Please do not discontinue the school social worker license. This is a valuable license that allows me to work within my professional environment. I think it is important for mental health support and social workers to have an education license since they work within education.

Thank you for your time.

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Respectfully,

**Amber Hellstrand, CSW**

Mental Health Specialist

Licensed School Social Worker

Weber School District

**From:** "Weller, BJ" <[BJ.Weller@canyonsdistrict.org](mailto:BJ.Weller@canyonsdistrict.org)>

**Date:** Wednesday, October 30, 2019 at 8:40 AM

**To:** Marianne Oborn <[moborn@tooeleschools.org](mailto:moborn@tooeleschools.org)>, Sue Hayes <[shayes@alpinedistrict.org](mailto:shayes@alpinedistrict.org)>, "Pearce, S Clay" <[scpearce@graniteschools.org](mailto:scpearce@graniteschools.org)>

**Subject:** Board Hearing Request for R277-306

Hi Team,

Will you please submit a request for a Board Hearing for R277-306 on behalf of the Student Service Directors Association? Attached you can see what I sent.

This Board Rule removes social workers as educators and thus no longer offers an Educators license. This is detrimental in several ways.

1. How do districts track licensing for Social Workers if it's not in Cactus?
2. Educators in Cactus generate funds for LEA's so LEA's would lose funding
3. Removing Social Workers as educators limits the scope of their practice to be viewed as mental health therapists instead of prevention and social emotional support specialists.
4. Social Workers would no longer be able to complete endorsement programs such as ELL or Gifted and Talented which could help specific schools tremendously.

In addition to the above, we just worked with the University of Utah last year to create a specific school social work track which will also be available online for distance learners as rural areas have had limited opportunities.

We will be proposing that USBE create a specific school social work model similar to what they have done with school counseling. This model would support rural to urban school district needs. We are at the beginning phase of school social workers in Utah and their numbers will only increase over the next few years as we continue to see a rise in mental health and suicidal ideation amongst our students. This is a critical juncture to create a clear path and provide supports to school social workers which in turn provides direct benefits and results to school communities and students. I can't tell you how many districts and social workers have reached out to me this past year wondering how to use their social workers and social workers who have never worked in schools try to navigate the educational system. I think it is unethical to hire social workers with no educational training and expect them to be liaisons with the education system and outside mental health agencies. How can a social worker help a family navigate the educational system if they don't understand it themselves. There is a clear difference between school mental health practitioners or therapists and school social workers. Sorry, now I'm just ranting.

If you would please send the hearing request ASAP we can get on the agenda, but this gives us time to put our talking points together.

Thank you!!

BJ Weller, M.Ed, LCSW

Director of Responsive Services

Canyons School District

9150 South 500 West

Sandy, UT 84070

801-826-5148

“The mission of Responsive Services is to ensure-

“Each Student is Safe, Healthy & Ready to Learn”

**From:** Shaw, Gregory <[Gregory.Shaw@canyonsdistrict.org](mailto:Gregory.Shaw@canyonsdistrict.org)>  
**Sent:** Tuesday, November 12, 2019 7:34 AM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** Social Work Educator License

Hello! My name is Gregory Shaw. I am a school social worker at Jordan High School and I've started my 4<sup>th</sup> year in the district. I am writing in regards to the proposed changes in School Social Worker licensing.

Since 2011 I've known I wanted to be a high school counselor and coach. I graduated Utah Valley University in 2014 with a Bachelors degree in Social Work and 2016 from the University of Utah with a Masters. Over my experience I've worked more than 800 hours in schools learning how to specialize my learning in a school setting. When it came close to graduation the U helped me submit the required paper work to receive an educator license as I met all the criteria. Because I knew I wanted to work in schools I have not actively pursued getting a Division of Occupational and Professional Licensing (DOPL) license to become a therapist.

I am concerned that with the proposed changes of social workers losing an educator license that I will no longer be able to work! I think and feel that I am more than qualified and having met the criteria of receiving a license to work in schools. I am also concerned with losing an educator license of what protections and safety nets I will lose from not having this license.

I hope that we can come to a middle ground to where individuals who have a DOPL license are still able to work in schools while me and others are able to keep their educator license to work. Maybe for those with a DOPL license can receive an educator license in an alternative way without having to meet the same criteria I met. These individuals have worked in clinical settings and many of these skills will translate into working in the school. I think that having a period where school training is involved and they have to show certain skill sets and growth toward specific goals of how to work in an education setting would be helpful and appease both sides.

I hope that the Utah State Board of Education will consider both sides and how this affects the people involved.

I love being a school social worker. I love that we are trying to get more social workers into schools to provide supports for the kids. It is necessary. I hope that I can continue to still work with an educator license to do the work that I enjoy! Thank you!

**Gregory Shaw, MSW**

Social Worker, Jordan High School

(801) 826-6349

**From:** Tammy Zundel <tammyz@provo.edu>

**Sent:** Sunday, November 3, 2019 11:38 PM

**To:** Stallings, Angie <Angie.Stallings@schools.utah.gov>

**Cc:** Herrera, Kim <Kim.Herrera@schools.utah.gov>; Austin, Lorraine <lorraine.austin@schools.utah.gov>; Rasmussen, Benjamin <Ben.Rasmussen@schools.utah.gov>; Child, Cybil <Cybil.Child@schools.utah.gov>

**Subject:** Re: Proposed School Social Worker Rules

Thank you so much for your time and the information. I do not see any information related to my original request for an update by the Utah State Board of Education in relation to the proposed **School Social Worker** rules. I, along with other social workers throughout the state, were asked to submit our thoughts and ideas for new proposed rules for school social workers. These ideas were submitted several months ago. I notice that many other school support personnel are addressed within [R277-306](#), but school social workers are not mentioned. Could you please point me in the correct direction to read the new proposed rules for school social workers or send me an update on the progress of the rules for **School Social Workers**.

Please feel free to call me if it would be easier for you at the number below.

Thanks again for you assistance,

Tammy Zundel

School Social Worker

**801-830-4609**

**From:** Koki Cline <[rcline@alpinedistrict.org](mailto:rcline@alpinedistrict.org)>  
**Sent:** Friday, November 8, 2019 1:19 PM  
**To:** Stallings, Angie <[Angie.Stallings@schools.utah.gov](mailto:Angie.Stallings@schools.utah.gov)>  
**Cc:** Austin, Lorraine <[lorraine.austin@schools.utah.gov](mailto:lorraine.austin@schools.utah.gov)>  
**Subject:** Hearing request on R277-306

Board Chair Mark Huntsman,

I would like to request a hearing on R277-306.

I am a Licensed Clinical Social Worker and received my school social worker certificate. I look forward to having public comments on the ruling and am excited about the potential collaboration this board rule change will facilitate.

With 2019 SHARP data showing student concerns regarding suicide and school violence, I am glad we are having this conversation now.

Sincerely,

Koki

Koki Cline, LCSW

School Social Worker

Alpine School District

385-352-3039

[rcline@alpinedistrict.org](mailto:rcline@alpinedistrict.org)



**From:** Sarah Boykin <[boykin.sarah@gmail.com](mailto:boykin.sarah@gmail.com)>  
**Sent:** Wednesday, November 20, 2019 10:03 AM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** Reconsideration of Rule R277-306

Hello USBE Representatives,

My name is Sarah Boykin and I live/work in your district. I am writing to you today to express concern at that recent passing of rule R277-306 regarding School Social Workers not being required to get their educators license and therefore not being considered educators any longer.

This is a major concern of mine as I am distinctly aware of the importance social workers play as part of the team of educators in a school. Social workers are involved with the daily function/lives of the students including attendance, meeting of basic needs, school culture/PBIS, supporting teachers in the classroom by teaching skills to the class as a whole, as well as, conducting groups with different students on a range of specific topics. As a part of the education team social workers are very aware and conscious of the unique needs of students and their parents, teachers, and administrators and serve a vital role in bridging gaps and connecting all members of the team.

Without the educator license many of these vital areas will go unattended as the social worker becomes simply a mental health practitioner practicing in a school setting. The major difference being the social worker will be limited to providing individual services to those students with high needs and concentrating solely on personal mental health which does not include attendance, social skills curriculum inside the classroom, and/or supporting teachers or administrators. This would be a HUGE detriment to not only the students but the school as a whole.

I strongly urge you to reconsider this ruling at the upcoming hearing on Dec 4, 2019; as well as, you to reinstate social workers as educators. Rule R277-306 seems short sighted as it only serves to limit resources we already have in place. The future students need as much support as necessary and it is our job as a community to provide that.

Thank you for your time and consideration,

Sarah Boykin

**From:** Kathleen O'Donnell <[kathleenkerry@icloud.com](mailto:kathleenkerry@icloud.com)>  
**Sent:** Monday, December 2, 2019 9:14 AM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** R277-306

To the USBE Board-

I am writing to you today to address the Educator's license for School Social Workers. USBE has made a vote to take Educator's licenses away from School Social Workers. This change would negatively impact School Social Workers in Utah and the students, families, and Educational professionals they work with.

I am currently a School Social Worker at Granger Elementary. I teach Social Emotional Learning to 850 students. Students learn about their brains, how to calm themselves, problem solving skills, and many other life skills. Without an Educator's License I would not be able to teach preventative school wide classes.

As a mental health provider in the school I would be limited to working with individual students or small groups. This work is important work but is ultimately different work than the work of a School Social Worker. Effective School Social Workers are integrated into the school environment and work with Tier 1, 2, and 3 students. Without an Educator's License School Social Workers would not be able to teach and participate in Tier 1 preventative work.

Please vote to amend R277-306 at the hearing. Your vote will make a lasting impact on students and the services that they are provided with.

Sincerely,  
Kathleen O'Donnell  
School Social Worker  
Granger Elementary

Nov. 19, 2019

Dear Brittney Cummins, [brittney.cummins@schools.utah.gov](mailto:brittney.cummins@schools.utah.gov)

On October 3<sup>rd</sup>, 2019, I learned that the Licensing Sub Committee recommended that School Social Workers no longer needed to be licensed as educators with the Utah State Board of Education. We would use only our DOPL license to work in the schools. I am dual licensed as an educator and as a Licensed Clinical Social Worker through DOPL. This helps me serve all students and families in the fullest capacity as a school social worker.

Granite School District has 80 school social workers. 90% of them give direct services to students in classrooms and small groups by teaching them skills to necessary for their success in life. For certified social workers (CSW) and licensed clinical social workers (LCSW) seeking a change in employment and having no experience in the education system, it would seem to be an easy opportunity to work in the school setting without an educator license. However, there is a steep learning curve for these DOPL social workers that requires more extensive training. Most have never taught in a classroom. They are unfamiliar with working in school settings or how to provide services where education holds priority. They need training in FERPA, educational law and policy that are substantially different from policies practicing in a mental health agency or private practice. On the other hand, educator licensed school social workers have unifying perspective and understanding of the educational setting and the parameters in which they work with all students to provide social emotional learning (SEL).

With the change in R277-306, newly hired CSW/ LCSW's will be excluded from the professional development that is critical in being part of the USBE's educational system. They will not be allowed access to the CATUS/Midas system that are in place for continuous education. They need access to trainings that are relevant to education and available to educator licensed colleagues, namely school psychologists and school counselors. Trainings such as Multi-Tiered System of Support (MTSS), school safety, English Language Learning (ELL), 504 and Special Education etc. are imperative to giving our students the very best services available.

It is my understanding that the reasoning for R277-306 was to give rural districts the ability to hire LCSWs without additional licensing. This will not help social workers to learn the education system. By giving access as an educator to the Midas training platform, USBE could use Midas courses to support the social workers hired in rural districts to learn more about the education system and support them to become better school social worker to serve our student needs. This would enhance the ability of school social workers to assist all students to be socially emotionally able to succeed in their academic and life endeavors.

As one of your constituents, I appreciate your support in changing the current ruling of R277-306. Please allow school social workers to have educator licenses. We will be addressing the USBE representatives on Dec. 5<sup>th</sup> at 4:00 pm at the rules hearing. I look forward to sharing with the board members what school social workers from across the state do to serve the students of Utah in educational capacities. If you would like more information prior to board rule hearing, my contact information is given below.

Thank you for your time,

Sincerely,

Andrea T. Miller, LCSW  
School Social Worker Coordinator  
Granite School District  
[amiller@graniteschools.org](mailto:amiller@graniteschools.org)  
801-530-9003

**From:** Weaver, Kelsey <[Kelsey.Weaver@canyonsdistrict.org](mailto:Kelsey.Weaver@canyonsdistrict.org)>  
**Sent:** Tuesday, December 3, 2019 11:00 AM  
**To:** Newell, Shawn <[Shawn.Newell@schools.utah.gov](mailto:Shawn.Newell@schools.utah.gov)>  
**Cc:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** Educator Licensing for School Social Workers

Representative Newell,

I am writing to ask the Utah Board of Education to reconsider discontinuing requirements for School Social Workers to hold a Utah Educator License. I am currently a School Social Worker in the Canyons School District with both a CSW license through DOPL, and an educator license. I believe students in public schools will be at a disadvantage if School Social Workers are no longer a part of the school team as licensed educators. Having an educator license ensures that School Social Workers receive specialized trainings, keeping our focus of practice in line with the public education framework. Being part of the school team is crucial to understanding unique circumstances of our schools, and for developing interventions that will be most effective in addressing the needs of students. Contracted therapists are not part of the school team, are not privilege to understanding the day-to-day organization of a school setting, and are at a disadvantage when it comes to planning supports and services for students. Taking away an educator license removes protections granted to educators and prevents School Social Workers from fully integrating as a member of the school team. Please take these points into consideration while you discuss the advantages and disadvantages of discontinuing educator licenses for School Social Workers during the R277-306 hearing.

Thank you,

Kelsey Weaver, CSW  
School Social Worker  
Butler Elementary School  
(801) 826-8020

**From:** Hankins, Marci A <[mahankins@graniteschools.org](mailto:mahankins@graniteschools.org)>  
**Sent:** Tuesday, December 3, 2019 10:39 AM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** School Social Workers  
**Sensitivity:** Confidential

Hello!

I am a school psychologist in Granite school district and I work very closely with many School Social Workers. They are a VITAL piece of the team at EACH AND EVERY SCHOOL here in Granite School District. As a school psychologist, we are already spread thin, but they have a unique role with the school. They connect so many of our families to community resources, therapy, housing vouchers, heating vouchers etc. in order to survive, yes, SURVIVE, and continue to support their kids and our students is integral to our school community! Please please we need them to continue to be licensed educators and support our schools! They do SO MUCH in supporting families, teachers, and OF COURSE the students and are an amazing support to the school and larger community. I honestly be able to focus on my job responsibilities and help the students without School Social Workers.

Thanks!

**Marci A. Hankins, Ed. S., NCSP**

School Psychologist

(385) 646-9833

West Kearns (M am, TH, F), Bacchus (M pm, W), Sandburg (T)

**From:** Filby, Michelle L <[mlfilby@graniteschools.org](mailto:mlfilby@graniteschools.org)>

**Sent:** Tuesday, December 3, 2019 10:24 AM

**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>

**Subject:** We need more help NOT less!

The state of Utah and The Granite School district need to start making their students a priority. Utah is consistently last in education, dollar per student ratio, teacher salaries.

I currently work in one of your elementary schools, two of my children attend there as well. I am a behavioral aide. Weekly I am in a position of acting in behalf of our Psychologists and Social Worker that are both divided between two and three schools. We only have a mental and emotional health professional in our schools 1.5 days in a week. This is unacceptable. I've already removed my oldest daughter from the Granite District due to her safety not being a priority in her school.

We should be doing everything we can to attract qualified professionals, train our aides to the best of our abilities, not cut funding and offer even less support to our already overwhelmed, under appreciated, burdened teachers and staff. Each of our students in each of our communities are important! It is time that the higher ups and board spend some time in the real world classrooms.

It is laughable that Granite School District and the State of Utah even pretend to be family oriented. Our schools are damaging our children. Please think about the students that are already at risk. Please do not vote to dismiss another child's education or health. As an educator and mother this is seriously frustrating and infuriating. Our schools need more time allowed with our Social Workers, Psychologists and Special needs aides.

Thank you,  
Michelle Filby

**From:** Johnson, Corinne P <[cpjohnson@graniteschools.org](mailto:cpjohnson@graniteschools.org)>  
**Sent:** Tuesday, December 3, 2019 11:47 AM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** Educator's License for School Social Workers

Hello - I am writing to express my support for measures that will continue to require an Educator's license for school social workers. I have been a school social worker for over 20 years. I have served on multiple multi-disciplinary teams over the years - a License provides us an equal place at the table with teachers, psychologists, speech therapists, etc. it validated the importance of a social work professional in the schools - one who understands the framework of education as well as a familiarity with the school and teachers. School Social Workers serve entire communities in so many diverse ways. I urge you to vote in favor of Educator's Licenses for School Social Workers.

Sincerely,  
Corinne Johnson, LCSW  
School Social Worker  
Granite School District

-----Original Message-----

From: CATHIE SCHOECK <[cathiefs\\_2@msn.com](mailto:cathiefs_2@msn.com)>

Sent: Tuesday, December 3, 2019 1:18 PM

To: Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>; Cannon, Janet <[Janet.Cannon@schools.utah.gov](mailto:Janet.Cannon@schools.utah.gov)>

Subject: Opposition to Bill #R277-306

Dear Representative Janet Cannon &USBE,

I have been a School Social Worker since December 2001. I have served in 5 elementary & junior high schools for 12 years and feel very proud to have been able to serve thousands of student in that time.

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> The huge benefit for me in having a Utah Educator's License is for the last 7 years, I have served as the College and Career Readiness Specialist for GSD. I wanted to be able to work with a larger number of students and to help make a greater impact for our GSD students. The Educator's License has allowed me to not only work with programming for College and Career Readiness in grades 7-12 but specifically my privilege to work with seniors to apply to college, fill out the FAFSA so students have funding to pay for college, and to help students earn scholarships. If I did not have a Utah Educator's License, I would not have been considered for this amazing position.

>

> Cathie F Schoeck, LCSW

> College and Career Readiness Specialist Granite School District

> 2500 South State Street

> Salt Lake City, UT 84115



**From:** Chelsea Champi <[cchampi@spectrumcharter.org](mailto:cchampi@spectrumcharter.org)>  
**Sent:** Tuesday, December 3, 2019 1:12 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** School Social Work Licensure

Good afternoon. My name is Chelsea Champi. I am a Licensed Clinical Social Worker that is currently employed as a School Social Worker at a charter school for students with disabilities, primarily those on the autism spectrum. I am writing today to express my thoughts and beliefs towards the USBE rule hearing taking place on December 5, which will decide if a specific School Social Work Certificate be reinstated as a requirement to work in an educational setting.

I received my Master's Degree in Social Work in 2015 through an online program outside of Utah. Upon graduation, I knew that I wanted to work in the educational field, however; due to lack of programs and services available for hire, I was unable to find a job in my desired career path. I worked in a non-profit providing clinical services until I was able to apply for a School Counselor position through the charter school I currently work in during the 2016-17 school year. The school recognized the need for social workers in their school and were willing to help me with alternate licensure in order to hire me to help their students. I worked under a School Counselor temporary licensure until the school was able to find funding to provide me with a more appropriate title and job duties that fit more under the umbrella of practice for social work.

I received my full LCSW licensure in the beginning of 2019 and, through the alternate pathway through USBE, was able to also receive my School Social Work Certificate verifying that I have the knowledge and tools needed to work in the educational setting. Working in a school environment was very different than a clinical setting and much of what was taught in a clinical-standing Master's program did not specifically apply to my work. Through great mentors and advocates, I was able to learn how to navigate these differences, however; it did not come easily and took much time and effort on my part to learn the different parts of educational and special education law.

I see my receipt of my School Social Work License just as valuable as my LCSW, as it is a reflection of the dedication and special knowledge needed to be called a school social worker. While this requirement was difficult to achieve due to lack of information and set standards, I also feel it was a valuable and necessary title to help differentiate the needs that a school social worker has when compared to one that would work in a fully clinical setting or other practice. Just as therapists can be trained in various aspects of clinical practice, such as Mindfulness, EMDR, DBT, and CBT; school social work should be able to be just as defined as a specific practice skills.

I feel that taking away the licensure for accessibility of hire not only reduces the value that is put onto a social worker in a school setting, but also limits the value of services that are provided to students and their families. School social work is not just about therapeutic interventions; we serve as advocates, brokers for resources, case managers, and, most important, educators. I claim educator as my title as that is often what I do; educating staff, students, parents, and community members on what our students need, mental health needs and deficits, effects of trauma and poverty on our communities, and much more. As an educator, I deserve to have an educator license that is protected by the same rights and regulations governed by USBE, and believe that by creating a more direct pathway to the School Social Work Certificate will only increase the services and benefits to serve our communities' children and families.

I appreciate the opportunity to speak my opinion and hope that the board will rule in favor of school social workers and our needs. Thank you.

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**Chelsea Champi, MSW, LCSW**

Mental Health Specialist

Spectrum Academy High School- North Salt Lake Campus

801-936-0318 ext. 7016

[cchampi@spectrumcharter.org](mailto:cchampi@spectrumcharter.org)

**From:** Janine Hansen <[janine.hansen@jordandistrict.org](mailto:janine.hansen@jordandistrict.org)>  
**Sent:** Tuesday, December 3, 2019 12:59 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** School Social Workers

I know that there seems to be a big group of people who think an educator's license is needed in the world of school-based Social Work. I think that some training should be given in the Master's program at the U of U, but I am not a fan of making everyone have a teaching license. I say this because if you are a well trained Social Worker and can function from a clinical perspective, a teaching license isn't required. The things you have to know about the way a school operates can be learned from other staff members and I am not convinced that a whole other level of licensing is required. I think you could obtain the knowledge one needs in a one day conference where all Social Workers and Mental Health Providers could learn the ins and outs of schools without the added expense of managing two licenses. I have been a Social Worker for 20+ years and have worked in different school districts, in several states. I know others are concerned, but it seems like an overreaction to other issues. Thanks for taking the time to entertain my thoughts and feelings.

Respectfully,  
Janine Hansen

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Janine Hansen, LCSW  
Health and Wellness Team  
Clinical Support Specialist  
Phone: 801-256-5603 or 385-272-2699 Cell

**From:** Woodward, Amber M <[amwoodward@graniteschools.org](mailto:amwoodward@graniteschools.org)>  
**Sent:** Tuesday, December 3, 2019 2:04 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** R277-306

Dear USBE,

I would like to take a moment to thank you for supporting the mental health of children. It has been wonderful to see the emotional well being of children becoming a priority.

I do want to take a moment and tell a little about my experiences working as a social worker in the school system. I have worked in a school without an educator's license as well as with an educator's license. The experiences were very different. After working in an elementary school, I decided to be a stay at home mother. During this time I had allowed my educator's license to lapse. I maintained my LCSW (DOPL clinical license). There were a few social workers who went on maternity leave and I was asked to cover for them. Because I did not have my educator's license, my job details were limited. I was to cover the clinical work that the previous social worker started. I ran individual counseling and group counseling. I helped with crisis for the students I had permission for. I helped in this capacity at 3 different schools for a total of 7 months and helped approximately 30 students.

I have held educator's license while working at 3 schools for a total of 12 years. During this time frame, I have been able to teach in classrooms. The lessons taught have covered social skills, social and emotional learning, hygiene, prevention of spreading lice, sexual harassment, suicide prevention, "good touch/bad touch", career options, graduation, etc. I also am an integral part of the infrastructure of the school system. I am actively involved in supporting teachers to understand the intervention process, implementing positive behavior programs, I have created a skill based program that reduced our office referrals in half. I am apart of the Special Ed team, the school leadership team, and the school Student Support Team. I respond to crisis for any student in the school. These job tasks are not ones I was able to do without the educator's license. My case load with the educator's license has been approximately 8300 students.

In summary, my concern for the change in licensure is for the students. Social workers will only be able to access students with parent permission prior to services. I often am able to serve a student in need then follow up with contacting parents later that day. Student access to services are more immediate and far reaching when social workers have the educator's license. Thank you for your time and consideration,

Amber Woodward, LCSW

**From:** Richard Landward <[Rich.Landward@socwk.utah.edu](mailto:Rich.Landward@socwk.utah.edu)>  
**Sent:** Tuesday, December 3, 2019 12:27 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:**

Hey Shawn

Sydney Dickson recommended I reach out to you. She said you are "awesome"

I live in Cottonwood Heights and work at the University of Utah as an assistant professor in the College of Social Work. Prior to becoming faculty at the University of Utah I was a school social worker at Midvale, Sandy, East Midvale and Copper-view Elementary Schools and had an educators license.

One of my roles in the College of Social work is to work with the community and our students to train and prepare them to become school social workers. When they have met our college qualifications they are then approved by our college for an educators licenses and their names are sent to the USBE licensing office for approval.

The school social work profession is a specialty area in the field of social work and requires specific training to work in schools with students, teachers and family's. School social workers must complete a 300 hour practicum and obtain an educator license to work in schools. This process has been the standard by which school social workers are considered qualified to work in schools for the last 40 + years.

Recently R 277-306 was passed by the USBE removing the need for social workers to have an educators license. This has devastated the school social work professional community and has significant ramifications to our profession and our professional protections. I asked that a hold be placed on implementing this rule until USBE could hear our position. 15 of us from the University of Utah College of Social Work, Granite School District, Canyons School District and NASW requested a hearing to plead our case in opposition to R277-306.

Before the hearing I was hoping we could visit in person or via phone. I live in Cottonwood Heights near Bangel Blvd and 3500. You'd be welcome in our home or I can meet you at your office or my campus office. If a meeting doesn't work a phone call would be great.

Thanks so much for all your doing as our elected official to the USBE. I've had many opportunities over the years to work with USBE and Sydnee and I appreciate all you are doing for our kids, teachers and parents.

Thanks

Rich Landward LCSW, MPA, MBB

Assistant Professor/Lecturer

College of Social Work University of Utah

**From:** Johnson, Bethany S <[bsjohnson@graniteschools.org](mailto:bsjohnson@graniteschools.org)>  
**Sent:** Tuesday, December 3, 2019 2:42 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** School Social Work Licensing

Please reconsider your position on school social work licensing. Although the intent of the ruling was to eliminate a hiring barrier, it has many unintended consequences that inhibit good practice in Utah schools. As a school social worker for 33 years I know that my clinical license would not have given me the broad base that my educators licensure has permitted me. Please listen to the voices of those who practice school social work.

Most sincerely,

Ms. Bethany Johnson, School Social Worker  
"The Feelings Lady"  
Bennion Elementary  
(385)646-2122

**From:** [prep72hrs@aol.com](mailto:prep72hrs@aol.com) <[prep72hrs@aol.com](mailto:prep72hrs@aol.com)>  
**Sent:** Tuesday, December 3, 2019 4:49 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** USBE 277-306

Dear Utah State Board of Education,

I am writing on behalf of R277-306. I am a school social worker in a Title One school setting. One of my greatest joys in this profession is being able to teach the entire school Social Emotional Learning skills throughout the entire school year. Many of our students have a great amount of daily trauma they deal with in their lives and this gives them a chance to learn new skills and incorporate them into their everyday experiences. They are learning with everyone else in the classroom and are not treated differently with Tier One level of teaching.

I believe there may be unintended consequences if R277-306 passes. One of the main jobs that school social workers do is teach various skills to the student body, such as PBIS (Positive Behavioral Interventions and Supports), College and Career Readiness, and Social Emotional Learning skills. The Educators License enables us to accomplish these tasks on a wide scale. This license requires us to go through additional training that enables school social workers to understand the education system.

Schools are not agencies. We are educators, and along with being school social workers. We are mindful of the educational process and have a great desire for our students to be the best they can be. Our students have great obstacles and count on us to be visible throughout the school. We will always be more effective teaching social emotional and preventative skills in our schools, than just seeing a few students every day. We are an important visible contact between students, families, teachers, and administrators.

We provide many services throughout our school and educating students in various areas adds to this invaluable framework of school social workers. Please help us to keep our Educators License so we can continue to provide important services and skills for our students so they can build on their abilities, increase resilience, and be ready for a bright future.

Sincerely,

Theresa Richardson

School Social Worker



**From:** Lora Mitchell Bonham <[lorabonham@gmail.com](mailto:lorabonham@gmail.com)>  
**Sent:** Tuesday, December 3, 2019 4:54 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>; Haynes, Mike <[Mike.Haynes@schools.utah.gov](mailto:Mike.Haynes@schools.utah.gov)>  
**Subject:** R277-306 change

To whom it may concern,

In July I was asked to respond to proposed changes to the Social Work Licensing Rule. I had questions and concerns about the items listed in the proposed changes and shared those with the USBE as I know several of my colleagues did as well.

A few of my thoughts/concerns related to the current inability for LCSW's to be able to work in schools who did not previously complete a practicum in schools while in the MSW program. (As there are many valuable LCSW in the community who have worked with children through hospitals, private practice, etc who would be a valuable asset to schools given the ability to work therein.) Also, I shared interest in the added requirement for social workers to be required to follow a school social work track or emphasis while in the MSW program and the need for schools across Utah to have some sort of standard or unified understanding of what school social workers are trained in, have education in and are qualified to do. I work as an LCSW in private practice with children outside of schools 1 day a week. I work as a school social worker 4 days a week with an insiders position and knowledge of the education system, SpEd laws, classroom management and all the school system understanding that I gained in my training and practicum within a school in Granite school district. Without that training, if I was working within a school as simply an LCSW, I would be lost, not speaking the same language as teachers and administration as well as putting my school and/or students at risk due to lack of education within the education framework.

I was recently notified that USBE has proposed to remove the Educator License from School Social Workers in Utah. I am shocked at this proposal, as are my colleagues. Many of us have worked hard to obtain that license and experience in Utah's schools. And I'm wondering how such a decision could be made without more research and representation from school social workers in Utah.

As licensed school social workers, we have earned respect and trust from students, their parents, administrators and staff as we educate them on the complex and interwoven facets of success of addressing the "whole student" in a classroom. We are teaching them about behavioral/and or intellectual difficulties due to a number of factors including trauma, drug exposure, poverty, etc. We bring a different perspective than any other educator in the school system due to our education in Systems Theory, Strengths-based perspective, communication, 4,000 hours in mental health to obtain an LCSW, advocacy for people's rights as well as for policy, crisis management and intervention and community involvement in schools.

To remove the school social workers educator's license is a mistake. Take a moment to look outside of Utah and see what so many other state board of educations are doing to include, support, respect and

utilize these licensed mental health professional within their schools. Then take another moment to consider why a state with the highest rate of teen suicides would remove the license of educator from a social worker within a school, thus removing a big piece of the interest and draw for us to be in schools working with these at risk students day after day.

Please reconsider. We deserve the right to keep our license just as the speech-language pathologists and psychologists.

Thank you,

Lora Bonham, LCSW  
School Social Worker  
Horizon Elementary School  
801-264-7420 Ext. 5751

--

Lora E. Bonham  
801-631-9980

**From:** Valerie Liggett <[valerie.liggett.lcsw@gmail.com](mailto:valerie.liggett.lcsw@gmail.com)>  
**Sent:** Wednesday, December 4, 2019 11:14 AM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** R277-306

To Whom it May Concern:

I am writing regarding the USBE R277-306 hearing. My name is Valerie Liggett and I am a Licensed Clinical Social Worker and a Licensed Utah Educator. I have been working in Granite School District as a School Social Worker since 2008. I started my career as a social worker at the University of Utah, Assessment and Referral Services. That job required specialized training as I was working with adults with drug and alcohol use disorders and I provided information to local courts and substance abuse agencies about appropriate level of care for the clients I would assess. In addition to the ways in which my Master's in Social Work program prepared me for that job, I also attended additional trainings to work with that population and was given direct supervision to help guide me with making ethical and professional decisions about what was best for my clients.

I speak to my previous experience in the substance abuse field as there some similarities between my experience there and how the rule R277-306 would impact my work in the schools if this rule were to proceed in its current state. Just as I needed specialized training and supervision to work with substance abusing clients, I also needed these things to do my work in the schools. In addition to working in the schools, I also work for a private mental health agency as a second job, providing direct therapeutic services to outpatient clients. One of my responsibilities in both my school job and my private practice job has been to supervise new CSW therapists as they work toward getting their LCSW hours for licensure. These experiences with jobs outside of the school setting provide me with a greater insight into the specialties required for different settings in which social workers are able to work. The supervision I provide in the private practice setting is different than what I provide to the School Social Worker. For example, in my school job, I focus a lot of my supervision on things like FERPA and HIPPA and how these interact in the school setting compared to other social work settings. We discuss how education law impacts our work in the school. We also focus on how our specific professional education and training in the mental health field can influence and guide things like policy, procedure, PBIS, SEL, MTSS, Suicide Prevention programming, and other Tier 1 and 2 programs and interventions within the school. If I were to say that last sentence to my private practice supervisees, they would stare blankly at me and need explicit vocabulary lessons on the majority of the programs named therein.

When I was first exploring various therapeutic professions that I could pursue as a career, social work appealed to me because of the diverse settings in which one could find a job. I had always been interested in working in a school and found value in being a mental health expert that could provide a much-needed point of view and expertise in the school setting. My mom and sister were both special educators, so I had a peripheral idea of what an IEP was and the specialized supports and legal expectations educators were required to balance. However, in

my interview for my first job in the schools, I was asked what I knew about Special Education. I said, "I know that students are allowed to get an IED, which is a specific plan for their individual needs." The educators around the table chuckled as I had misnamed the important educational acronym and confused it with the acronym describing something that explodes (Improvised Explosive Device). Luckily my fellow educators were forgiving, and I got the job despite my mistake. This is a silly story, but also demonstrates an important aspect of why rule R227-306 could greatly impact the connection between social work and education via the School Social Worker dual licenses of an LCSW and Utah Educators License. Having been provided the training, direct supervision and required work experience to earn my Utah Educators License in addition to my LCSW, has given me the knowledge and experience I need to succeed in this job. If I were to decide to leave this work setting and pursue a job in one of the other diverse settings for which my LCSW allows me to work, I would still need to ensure I had the support, training and access to supervision that would allow me to be ethical and productive with my work with that new clientele. In conversations I've had with fellow LCSW colleagues, they have often expressed an awe about the differences of our jobs and feeling inadequate about facing some of the challenges I face within the school setting. They have commented that they would be at a loss of what to do in various situations that they have not needed to consider or deal with within their frame of practice.

Please consider the above when making a decision about rule R277-306. Having both and LCSW and a Utah Educators License has allowed me to be most effective in my work at Cyprus High School. In consulting with other my district supervisors and their work in the collaboration with other School Social Workers in the state, I support the idea of including language and ways to allow for social workers that are interested in working in school to get alternatives to licensure for their Utah Educators License. This is something that USBE has already established for teachers that are looking to change careers and get into education. I see the value in providing a similar opportunity for LCSW colleagues that can add their experience and expertise to school setting. We need more support for mental health and Social Emotion Learning in schools and providing a way to help non educators to get a license is important and can bridge the gap in this important work.

Thanks for your consideration,

Valerie D. Liggett, LCSW  
School Social Worker  
Cyprus High School  
385-646-1745

**From:** Lisa Araujo <[lisa.araujo.lcsw@gmail.com](mailto:lisa.araujo.lcsw@gmail.com)>

**Sent:** Wednesday, December 4, 2019 8:39:53 AM

**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>

**Subject:** Comments for Proposed Rule R277-306 Student Support License Area Preparation Programs

I am a Licensed Clinical Social Worker, and a Licensed School Social Worker for Ogden School District. I feel it is important to continue to require a social worker be licensed through USBE and meet all current requirements to hold the unique position of school social worker.

While the MSW and attainment of your LCSW prepares you for a variety of social work roles, the school system is unique. Interning for one year at a school as part of the licensing requirement is important as it gives the practitioner an idea of the goings on and flow of working in a school. Learning about the importance of data is something that was a challenge for me personally once I got the job and became responsible for proving and showing evidence of effectiveness. Social work is largely qualitative research and it can be frustrating at times to try and show evidence that there really isn't evidence for. Over the past 4 years, I have become much better at this, but it is important for social workers wanting to work in schools to be prepared for this. You also fill many roles in the school setting, the job is not structured as one might imagine and this may lead to people taking a job in the school system and end up disappointed.

I also feel we should continue to be licensed by the USBE to ensure our salaries are protected at the LCSW level as we have passed a rigorous licensing exam and completed thousands of hours of practice and supervision to attain that title and license. This exam is extremely difficult, and to attain the LCSW license is something to celebrate and acknowledge and should be compensated for. I am proud to be among the select few Licensed School Social Workers in the State of Utah and I hope other social workers at the Bachelor's level and Master's level will strive for that licensure so that we can provide the best support for Utah's youth.

Social Workers have very different and specialized training than school counselors do. I do not feel there should be cross over and they should remain specialized areas and should receive the same protection under each license.

Given the rise in suicide rates among our youth and the pressure they face on a daily basis, I feel the State of Utah should invest in putting Licensed School Social Worker's in all schools as a way to increase preventative services and mental health stability.

Thank you for your consideration.

Lisa Araujo, MSW, LCSW, Licensed School Social Worker

**From:** Jeanna Haines <[jeanna100@yahoo.com](mailto:jeanna100@yahoo.com)>  
**Sent:** Tuesday, December 3, 2019 7:31:12 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** USBE the R277-306

To whom it may concern,

I am a first grade teacher at a title 1 school. We are lucky enough to have an amazing social worker that also has an educator license. I have taught for almost 15 years in various schools among two school districts in Utah. My first experience with a school social worker was very limited because they were able to only work with a few students. My latest experience has been so different. The amount of support that all of my students get from their help is super beneficial. I've learned so much from the expertise of my social worker. She has helped my students learn social skills, emotional regulation, the prevention of lice spreading (which has been very much needed a few years), the difference between good touch vs bad touch, and lessons in team building. She has arranged schoolwide activities for positive rewards, has taught schoolwide rules twice a year with a walk through of the building so all students are aware of the expectations, and has created a year long program of skills of the week that we teach in each classroom.

Our social worker is an integral part of the behavior student support team and well as the academic student support team. She helps us see the whole student and not just the academic or just the behavior.

I think it would be a huge disservice to remove the educator's license from our social workers. Over the years our social worker has built relationships with so many students and families that she has only been able to do so because she has an educator's license and she is able to be in the classroom. She would not have this same trust and respect with our students or with their families if she is was only the social worker.

Thank you for your time.

Sincerely,  
Jeanna Skeete

Sent from my iPhone

**From:** Scaglione, Lisa M <[lmscaglione@graniteschools.org](mailto:lmscaglione@graniteschools.org)>  
**Sent:** Tuesday, December 3, 2019 7:11:34 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** Social work

To whom it may concern,

I am a teacher at David Gourley Elementary in Kearns, UT. I don't have too much information on the changes to the degree and role of social workers in a school setting but I did hear of a few. I am writing to inform you of all the beneficial things our social worker has been able to do with her license. First, she is a huge part of our behavior and academic team. She has knowledge about how to help these students that teachers just do not possess. She has also run a lot of school wide incentive programs including behavior and attendance rewards. She is able to push into classrooms and teach certain classes that help protect and inform students of necessary things such as sexual harassment, social skills, hygiene, lice, growth mindset, etc. she is able to service far more kids with her current license than she would be able to if it were changed. She hugely assists in crisis situations where she is trained to deal with the intensive behaviors that may otherwise pose a threat to a classroom of students. She is so much more than a counselor for these kids that have no where else to turn. The impact that our social worker has made on various kids and families is monumental and I would hate to see that limited in a population that needs all the help they can get! Thank you for your time and consideration.

Lisa

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**From:** Ornegri, David <[David.Ornegri@canyonsdistrict.org](mailto:David.Ornegri@canyonsdistrict.org)>

**Sent:** Wednesday, December 4, 2019 5:27:59 PM

**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>; Newell, Shawn <[Shawn.Newell@schools.utah.gov](mailto:Shawn.Newell@schools.utah.gov)>

**Subject:** R277-306 hearing

To Whom It May Concern:

My name is David Ornegri and I am a school social worker in Canyons School District. I'm contacting you in regards to R277-306 and why I am urging you to allow school social workers to have an educator license. An Educator license provides me with protection to practice in the school setting and ensures specialized trainings so that I am part of the school team as opposed to contacted therapists.

In meeting with my colleagues over these last few weeks, here are a handful of reasons that I feel we should have and educator license:

- Educator license aligns the clinical trainings with the public education system framework.
- The trend nationwide to require state certification to work in public schools.
- The trend statewide to hire more social workers.
- School social workers are the navigation between clinical agencies seeking to support students and k-12 systems that operate under LRE.
- Differences in FERPA and Confidentiality.
- Proposal to USBE for Licensure and school-based internship training.

I urge that you take these points into consideration. I appreciate your hard work and for allowing me the opportunity to practice school social work in our great state of Utah!

Thank you,

Davey M. Ornegri, MSW, CSW  
School Social Worker  
East Midvale Elementary  
801-826-8350 ext. 68407



**From:** Cole Robinson <[jcolerobinson@gmail.com](mailto:jcolerobinson@gmail.com)>  
**Sent:** Wednesday, December 4, 2019 5:02:18 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** R277-306

To Whom it may concern,

I am writing you as a concerned school social worker. I was recently made aware of the change being proposed in R277-306 to do away with the educator license requirement for school social workers. I started my career in social work at DCFS and spent 6 years there while also pursuing my masters in social work. My dream was to become a school social worker and while in graduate school I was able to complete a year-long practicum at Provo School District that was invaluable to me as I worked toward my goal of being a school social worker. I learned so much about how to practice social work in a school setting, and it furthered my desire to be a school social worker. I was able to complete the requirements from that practicum to earn my educator license to practice school social work upon graduation from the University of Utah. I understand that there is difficulty in getting social workers licensed to practice school social work, if they were not able to complete the requirements while in graduate school. With the mental health crisis facing our youth, we need more licensed school social workers in the schools, not less. I feel the change to remove the requirements for an educators license for school social workers will do more harm than good. Doing social work in a school is different from many other forms of social work and I feel that rather than doing away with our license, the USBE should consider making it easier to gain an educator endorsement through an alternative route, just like they do with the ARL program for teachers.

As a social worker at McMillan Elementary School I am always in the classroom doing observations, dealing with behavior challenges, presenting anti-bullying curriculum and talking about suicide prevention as well as talking to students individually about issues they are having at school. I complete home visits for various reason with families that are in my schools boundaries and just today spent a couple hours discussing truancy with my principal and formulating a plan and goals to help these families get to school. I run small social skills groups and teach students how they can implement what they learn in school and at recess to gain more friends and feel more social. I had to gain classroom management skills while completing the requirements for my license and to allow a social worker into a school without that background would be difficult for them but especially for the students. There is a lot of social and emotional learning going on in schools now and having an educators license as a school social worker gives us the innate ability to work with students in the classroom setting while also supporting the teachers, parents, and administrators in the school.

Social work can be a very broad field and licensed social workers can come from various backgrounds that may not have prepared them to practice the specific needs we see in our schools working with our students. I feel the board has good intentions in trying to get more help for our students with all they are facing in this day and age and we are seeing an increased need for social workers in our schools. I understand this can be problematic for rural areas to get mental health help in their schools when they are limited with people who may be qualified or licensed to work in a school. Which is why I feel the board needs to work with the various districts that have school social workers in creating a path for licensed clinical social workers to gain their educators license rather than doing away with the requirement all together.

I appreciate all the work you do in creating a better school setting for all our students and I hope my concerns have helped shed some additional perspective as the board considers this matter.

Sincerely,  
Cole Robinson

**From:** Spencer Taysom <[spencerktaysom@gmail.com](mailto:spencerktaysom@gmail.com)>  
**Sent:** Friday, December 6, 2019 3:36:32 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** Public Feedback on R277-306 completed

To whom it may concern,

I am writing this as part of the public comment period after the public hearing on R277-306. I am a social worker currently employed in Canyons District, but have been employed as a psychotherapist by Valley Behavioral Health in the past. I have had internships in Child Welfare and in a clinical mentoring program.

Social work has always been a generalist profession. We are taught and develop a set of clinical skills and are expected to apply them in a vast array of professional settings and roles. In any given role a social worker may be a: broker, advocate, case manager, therapist, facilitator, organizer, and or an educator. DOPL evaluates and licenses social workers based on their competence in these roles.

I believe that current DOPL licensing is sufficient and that an educator license is NOT necessary for a social worker to effectively and expertly do their jobs in schools.

During the meeting it was argued that educator licensed social workers are expected to have specialized knowledge of IEP's, FERPA law, LRE, and other areas. While this is factually true it ignores important context: In every setting that social workers operate there is specialized knowledge required to fulfill the role. IEP's are parallel to case plans, FERPA is parallel to HIPPA, etc..

Specialized knowledge is required and training is given in EVERY setting such hospitals, child welfare, hospice, and many others. These other settings recognize the generalist nature of social work practitioners and impart the specialized knowledge required for their specific setting and do not require additional licensing as it is redundant.

I believe that requiring both a DOPL and education license harms the fabric of my profession and potentially fractures it into many, many sub professions. How long will it be before a specialized, specific license will be required to practice social work with "aging adults in poverty who also are experiencing chemical dependence" which would be a different license than "aging adults not in poverty with mental health challenges"? I don't see where the specialization will ever end

I urge the board to vote to only require a DOPL license to practice school social work. We are well trained as professionals to work within ANY system and while those systems impart their specialized knowledge to the worker, they ought to recognize the skills that every social worker brings to the table in EVERY setting.

To be a broker, advocate, case manager, therapist, facilitator, organizer, and or an educator is TO BE a social worker. Additional licenses are not required.

Thank you again for your consideration.

Sincerely,

Spencer Taysom, CSW

PS I apologize for sending two messages, I accidentally sent the first one.

**From:** Katelyn Bosch <[ktbosch14@gmail.com](mailto:ktbosch14@gmail.com)>  
**Sent:** Wednesday, December 11, 2019 2:23 PM  
**To:** Austin, Lorraine <[lorraine.austin@schools.utah.gov](mailto:lorraine.austin@schools.utah.gov)>  
**Subject:** R277-301

11/12/2019

To Whom it May Concern:

My name is Katelyn Bosch. I work as a School Social Worker at a very highly impacted school with 63.20% ELL learners and 100% free lunch. This is my fourth year as a School Social Worker. My supervisor shared with me the rule revision of R277-301 and R277-303.

Having an educator's license allows a School Social Worker to enter every classroom when needed and deliver Tier 1 Social Emotional Learning to students. This is very vital and important in the struggle teachers are having with student behavior. The social skills being taught in the classroom with developed and evidenced based curriculum help students learn to become a productive citizen.

If we are seen only as mental health therapist it limits how we can impact school wide prevention and intervention for such things as bullying, suicide prevention, attendance, and College and Career Readiness that are such big issues currently with students.

At my school we have had an increase in student behaviors that are very concerning. Together with my supervisor and principal we got grant money for another full-time social worker. She teaches social skills all day to every student and every week here at school (which she could not do if this rule continues in force). I respond to behavior crisis or family needs crisis around the school.

Along with teaching Social Emotional Learning and responding to behavior and family crisis throughout the day there are other responsibilities that we attend to. These responsibilities include attendance and truancy, SPED team support, and a key member of the Student Support Team. We often are vital in creating 504's, and the Leadership Team. Currently I am head of the attendance committee and PBIS committee at my school.

*Katelyn Bosch, LCSW*

**From:** Boyd, Kailey <[Kailey.Boyd@canyonsdistrict.org](mailto:Kailey.Boyd@canyonsdistrict.org)>  
**Sent:** Wednesday, December 11, 2019 2:40 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** <no subject>

I think taking away educator licenses is a very costly mistake. I am a Special Educator and the resources that my school trained Social Worker provides for my students is very crucial to their success in school. If this law goes into place, schools will be flooded with Social Workers with no experience or background in education or any knowledge of how a school runs. It would be taking a giant step backward. This would have a huge negative impact on the special education population in all schools. Please do not consider taking away educator licenses for social workers.

Thank you,  
Kailey Boyd

**From:** Edmunds, Paul <[pedmunds@graniteschools.org](mailto:pedmunds@graniteschools.org)>  
**Sent:** Monday, December 9, 2019 10:05 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** School Social Work Licensing, R277-306-6 Hearing

USBE Members:

I would like to address Carol Lear's question, "Where were you three years ago?", from the Wednesday, December 5, 2019, hearing on School Social Work licensing as part of Board Rule R277-306. I assume she was referring to the Board Rule made approximately that long ago that gave LEAs the option of hiring teachers who did not have USBE licenses. While this did allow for that variance, it is simplistic to suggest that the need for Educator licenses was eliminated. If that was the case, USBE would cease to issue those. A more accurate characterization is that a stopgap was provided for LEAs to fill teaching positions in time of shortages. The Educator license remained, and remains, the preferred gold standard for teacher education and preparation to effectively instruct Utah students. While I remember concerns being raised over that action, I believe it was generally acknowledged that the provision was necessary to ensure that classrooms were adequately staffed. There was no general hue and cry at that time because the ability to obtain, and the importance of, an Educator license was not eliminated. Had that happened, I am sure you would have heard many concerns voiced.

While this current situation is similar, with a shortage of qualified school social workers, the USBE solution has been dramatically different. Rather than providing an additional avenue for LEAs to hire social workers in the schools while maintaining the gold standard of preparation, the School Social Work license, USBE chose to eliminate the license. This also fundamentally changes the relationship a school social worker has with his/her employer and peers in the education setting. Although I do believe the intent was to help schools and students, the unintended consequences will cause significant difficulties for LEAs and school social workers alike, and this is why there has been a significant response to this current rule change.

I would encourage the board to reconsider their earlier decision and reinstate ongoing USBE school social work licenses.

Thank you,

**Paul Edmunds, LCSW**

Prevention Coordinator

Phone: 385-646-4630

@GSDPrevention



**From:** Ernest, Gabrielle <[Gabrielle.Ernest@canyonsdistrict.org](mailto:Gabrielle.Ernest@canyonsdistrict.org)>  
**Sent:** Thursday, December 12, 2019 11:15 AM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** R277-306

As a School Social Worker I have both my SSW and my LCSW. I need both. What I do in a school is so different from what I have done in any other aspect of my field as a social worker. I have worked at a hospital, for DCFS family preservation, and private practice. Being in a school requires knowledge of PBIS, MTSS, Special Education Law, etc. Without gaining my SSW I would never have been able to learn and get the supervision needed. I love being a part of the school team serving on committees and being a part of meetings. I worry without my SSW license districts will be able to have contract therapists come in and replace my job. The issue without that is the contract therapist are not being a part of the school environment and decisions are not being made by the whole school team. Social Workers need to be made part of the school in order to be the most effective.

Thanks.

Gabrielle Ernest, SSW, CSW  
School Social Worker  
Bella Vista Elementary  
801-826-7830

**From:** Trice, Wayne <[Wayne.Trice@canyonsdistrict.org](mailto:Wayne.Trice@canyonsdistrict.org)>  
**Sent:** Thursday, December 12, 2019 10:53 AM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** R277-306

Dear USBE:

I am providing feedback regarding School Social Work licensing rule R277-306. I support School Social Workers retaining an educator license.

Professional Standards and Training: Educator licensed School Social Workers (rather than DOPL only licensed) will have the training and expertise to support and implement student support systems imbedded in schools. Educator Licensed School Social Workers will be trained in MTSS, PBIS, and RTI that are all systems utilized in public education as a means to meet large populations of students. These systems render services that are accessible to all students and are prevention focused. DOPL licensed social workers will come with expertise in the medical model for providing services which provides service only when a diagnosis exists. This will not be an effective or equitable model of resource distribution.

Increasing the number of School Social Workers: Mental health resources are scarce especially in rural settings. In fact, all sectors of public education have shortages in highly qualified staff. Eliminating professional standards is a short-sighted approach to recruitment and will undermine not only the goal of highly effective educators and leaders but fragment the practice of school social work. This will ultimately lead to a compromise for the state of public education in Utah because a full continuum of services will rely solely on the expertise of the social worker rather than adopting best practice for systemic approaches to meeting student needs.

Bridging mental health with education practices: There has long been a division between educators and treatment providers. The professional language itself is often a barrier to collaboration. Educator Licensed School Social Workers are able bridge the clinical language with Social Emotional Learning terminology and thus, include educators into specialized interventions just as they support social workers being part of specialized curriculum plans. Without the educator professional standards and training, the provision of service to students will maintain a siloed approach.

HIPPA and FERPA dilemmas: Social workers are trained in rules and ethical codes for protected health information. Educator Licensed School Social Workers are further trained in FERPA. There is overlap between these two rules and social workers practicing in schools without understanding FERPA may over or under disclose necessary information that is vital to service delivery. This may also lead to violations in district policy or violation of professional ethics leading to due process.



Funding: Removing School Social Workers from educator licensing will have an impact on funding that LEA's have for FTE. This will have a significant impact on some areas.

Services to Students with Disabilities: The Utah State Board of Education Special Education Rule book states: "School social workers and school psychologists providing services to students with disabilities must be licensed by the State Board of Education and school social workers or school psychologists." Removing Social Workers as educator licensed will not be able to provide services to students with a disability.

Conclusion: Improving instruction, equity, and safe schools must include a comprehensive and wide service delivery approach. Addressing barriers to learning in schools cannot parcel out mental health supports to a select few students with the most complex needs and expect that all students will benefit. Educator licensing that incorporates professional standards will lead to partnerships that support equity and safe school initiatives. R277-306 is a window of opportunity to create an infrastructure that will lead to collaboration between educators and mental health specialties. And without educator licensure, mental health supports will be relegated to contracted sidebar services that support only a few students.

C. Wayne Trice, LCSW  
School Social Work Specialist  
Canyons School District  
Responsive Services Department  
9150 South 500 West  
Sandy, Utah 84070  
Cell/Text 385-347-8672

**From:** Durrant, Adrienne <[Adrienne.Durrant@canyonsdistrict.org](mailto:Adrienne.Durrant@canyonsdistrict.org)>  
**Sent:** Thursday, December 12, 2019 1:36 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** rule R277-306

Dear USBE:

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Professional Standards and Training: Educator licensed School Social Workers (rather than DOPL only licensed) will have the training and expertise to support and implement student support systems imbedded in schools. Educator Licensed School Social Workers will be trained in MTSS, PBIS, and RTI that are all systems utilized in public education as a means to meet large populations of students. These systems render services that are accessible to all students and are prevention focused. DOPL licensed social workers will come with expertise in the medical model for providing services which provides service only when a diagnosis exists. This will not be an effective or equitable model of resource distribution.

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Thank you for your thoughtful consideration in this very important matter.

Sincerely,

Adrienne Durrant, SSW, CSW

Mt. Jordan Middle School

School Social Worker

801-826-7414

**From:** Andino, Christina <[Christina.Andino@canyonsdistrict.org](mailto:Christina.Andino@canyonsdistrict.org)>  
**Sent:** Thursday, December 12, 2019 2:16 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** R277-306 - OPPOSE

Hi USBE,

**Reference: R277-306**

I am a School Social Worker in the Canyons School District. Our school has three Accomidated Core Classrooms (ACC's) that support students with special education services. Many of the students have counseling minutes and goals that I provide services for. According to the UTAH STATE BOARD OF EDUCATION SPECIAL EDUCATION RULES in October 2016, I must hold a Utah Professional Educator License in the area I am providing services for. I copied and pasted this below:

*"IX.H. EDUCATOR LICENSE REQUIREMENTS (R277-504, R277-506, and R277- 520). Professionals providing services to students with disabilities must hold a Utah Professional Educator License or Endorsement in the area in which they provide services. This includes special education teachers, speech/language pathologists, school psychologists, school social workers, and other professionals. Physical and occupational therapists must hold appropriate Utah licensure. The school district superintendent or charter school administration shall be responsible for the evaluation of the appropriateness of licenses and endorsements when assigning staff members. LEAs should refer to the USBE Teaching, Leadership, and Paraeducator Standards."*

If R277-306 is passed, our students would not have access to the counseling services written in their Individualized Education Plans. Therefore, I **OPPOSE** R277-306.

Thank you,

*Miss Christina*

Christina Andino, MSW, CSW  
School Social Worker  
Silver Mesa Elementary  
801-826-9405

-----Original Message-----

From: Stephanie Nichols <[stephnichols22@gmail.com](mailto:stephnichols22@gmail.com)>

Sent: Thursday, December 12, 2019 10:53 AM

To: Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>

Subject: Educator license for school social workers

Hello,

My name is Stephanie Knight. I am currently a MSW student at the University of Utah. I am currently doing my practicum at an elementary school and plan on doing school social work as my career. I wanted to voice my thought in regards to the possible change happening with the removal of school licensure. I want to keep the educator license because with it I have been required to get the proper training in regards of how to work in a school. If the license is taken away people coming in will not get that same training. This licensure also provides equality and protection for us in the educational setting. Having an educator license has allowed us to be an integrated member of the school and with-out it I fear our role will narrow.

Please consider keeping the educator license as it benefits schools and school social workers!

Thank you,

Stephanie Knight

[stephanie.knight@canyonsdistrict.org](mailto:stephanie.knight@canyonsdistrict.org)

801-864-4523

-----Original Message-----

From: Ginsburg, Victoria <[VICKY.GINSBURG@canyonsdistrict.org](mailto:VICKY.GINSBURG@canyonsdistrict.org)>

Sent: Thursday, December 12, 2019 3:42 PM

To: Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>

Subject: Social worker Licensing

To whom it may concern:

I do not support the proposal that Utah social workers employed in a school will not need an educator's license.

In order to be effective in helping schools deal with the trauma, mental health issues, and the disabilities of our students, our social workers need to understand the complexities of dealing not just with the students, but the unique issues that are inherent to school systems.

Learning the intricacies of IEPs and 504 plans is not something that can be learned on the fly. Especially since there are federal laws that are mandated.

I realize that this puts a financial burden on potential educational social workers, but the attrition due to being overwhelmed would be costly to the school districts.

The smaller school districts could possibly be exempted from the educator licensing requirement. In this way students in smaller districts would have the opportunity to have social worker services.

Vicky Ginsburg

**From:** Love, Abigail <[Abigail.Love@canyonsdistrict.org](mailto:Abigail.Love@canyonsdistrict.org)>  
**Sent:** Friday, December 13, 2019 8:34 AM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** School Social Workers

If social workers are no longer required to have an educator license school districts will be able to hire clinical social workers WITHOUT ANY school experience. Most will not know how to work with IEP and 504 cases or know about accommodations and know little to nothing about behavior management in classrooms. In addition to this, without an educator license the district isn't mandated to provide them training. All of these things are indispensable to our students. I have sat through many IEP meetings with social workers. Without them having true idea to what the classroom is like (going to school as a child does not count) there would be miscommunications happening and balls dropped.

Please do not let social workers without educational licenses be able to work in schools.

Thank you,

**Abby Love**

Jordan High School  
English 10  
Cheer Advisor

December 13, 2019

Jennifer Graviet, District 4  
Utah State Board of Education  
250 East 500 South  
Salt Lake City, UT, 84111

Dear Representative Graviet,

First, I want to personally thank you for attending the board rule hearing on December 5<sup>th</sup> and for mindfully listening to the concerns of all the great people advocating for school social workers to remain dual licensed.

The purpose of this letter is to share my opinion about the passing of R277-306 in recent legislation. I write this letter as a mother, school social worker, clinical social worker, community member, concerned citizen and most importantly as an advocate and ally for all children. I became a school social worker because I am passionate about providing comprehensive mental health services to children; especially those who may be at a disadvantage (socially, emotionally, economically, cognitively, physically, racially). I believe that in order to prevent or alleviate larger scale social issues, we must strategically provide preventative services to one of the most vulnerable populations; CHILDREN. Removing the “educator” role from future school social workers is a great disservice to our community, city and great state. I am concerned the current legislation may lead to an unintended consequence, resulting in dismantling the social worker role in school-wide preventative services.

Personally, going into classrooms and being an active participant in the macro happenings at my school is a large part of my role as the school social worker. I love going into classrooms because it provides a space to teach kids important social and emotional skills, including self-awareness and emotion regulation (mindfulness!). It also allows me the opportunity to observe kids with a mental health professional lens—picking up on body language and unspoken emotions. It is not uncommon for me to become aware of a child in need of some extra support when I am teaching in their classrooms. To me, this is crucial in



identifying children at risk, who are more on the quiet side, or covertly struggling with an adverse experience. Another pro to being in classrooms is that kids get to know me.... And, that is super helpful for them to really believe there is a safe, non-judgmental person they can talk to at school.

I was attracted to school social work because it yielded a route for me to make changes at an institutional level through advocacy, education, prevention and intervention, uniting a mental health and educational framework. I graduated in 2018—being a non-traditional student, whom had a goal of acquiring a degree in education or social work once my children were older. Through my educational experience, I found my passion was advocating for children and families at risk and supporting them in the school setting. You see, I am not only a professional, but also a mom who benefited greatly from having a school social worker rallying for my child’s success at school and in life.

I am so grateful for the privilege to comprehensively support students, teachers, staff and families. I understand that I am uniquely qualified to do so because of my education, personal experience and yearlong internship with Granite School District. The internship was a central component in becoming proficient with district programs, procedures, and policies, regulated and monitored by the USBE. I look forward to many great years working diligently alongside educators to support children in the school setting, and for having the opportunity to advance my role in the school system, should I choose to do so. I hope future social workers pursuing a career in education are actively working on a macro level, in addition to individual work, and that they continue to receive the same benefits as an educator.

Below you will find an excerpt from a parent email I received yesterday offering a thoughtful appreciation for the presence of a social worker lens in a multi-tiered system of support at school:

*Melinda,*

*I just wanted to reach out and say thank you for your help with my student’s 504. It is clear that you have a genuine interest in helping them succeed. I can tell you truly understand what it means to have dyslexia and ADHD- not many people “get it”. You do! I feel so grateful to have you in our corner. I left the meeting today feeling like I have a whole team behind me rooting for my child. That hasn’t been my*

*experience in the past at our other school. I am so grateful for your kindness and compassion. Thank you for being so good at your job and making a difference in our lives.*

In conclusion, I want to thank you for taking the time to read my letter (I am sure you have many to sift through). And, thank you for your long hours and continuous efforts to advocate for the best interests of the remarkable students in Utah!!

Best,

Melinda Riggs, MSW, CSW

**From:** Gladbach, Marian <[Marian.Gladbach@canyonsdistrict.org](mailto:Marian.Gladbach@canyonsdistrict.org)>

**Sent:** Friday, December 13, 2019 1:21 PM

**To:** Austin, Lorraine <[lorraine.austin@schools.utah.gov](mailto:lorraine.austin@schools.utah.gov)>

**Subject:** School social workers & licensing

Dear Ms. Austin,

I am not sure that you are the appropriate person to receive this but, yours is the only name and email I could find. I hope you will send my comments along to the correct person.

I am a Special Education teacher at Jordan High School in Sandy, Utah. I currently work with 2 social workers on a daily basis. Each one has the appropriate training to work in schools. Just today, I spoke with a mother whose son was having suicidal ideations. I am so grateful that Greg was available and knew exactly what to say and how to say it. Having social workers in the school makes an immediate difference not only for special education students but, general education as well. Social workers, with specific training for school environments, are invaluable because they know school related procedures, are visible to all kids and are involved in school related activities. In addition, special education has specific rules and procedures that must be followed. Having a social worker with no training in that area makes special education teachers' jobs even more difficult and would impede the timeliness of an intervention response.

Thank you for this opportunity to share my concern.

*Marian Gladbach*

*Teaching is organized chaos*

**From:** Elizabeth McCoy <[elizabeth.mccoy@waynesd.org](mailto:elizabeth.mccoy@waynesd.org)>  
**Sent:** Friday, December 13, 2019 1:07 PM  
**To:** Austin, Lorraine <[lorraine.austin@schools.utah.gov](mailto:lorraine.austin@schools.utah.gov)>  
**Subject:** School Social Work Educators License

Utah State Board of Education  
Re: Social Work Educators License

December 11, 2019

To whom it may concern,

My name is Elizabeth (Liz) McCoy. I am a newly hired LCSW working in Wayne County School District. Please note I am not speaking on behalf of the Wayne School District but rather for myself.

I do not support USBE dropping the Educators License requirement for School Social Workers. I say this even though I myself am working under a Letter of Authorization. I recommend the USBE and the Universities who offer MSW degrees create easier access for LCSWs to obtain their educators license, especially if said LCSW is hoping to work in a rural area. Based on my experience this could be accomplished by having appropriately certified and licensed supervisors available to assist a LCSW trying to work in school settings. Perhaps, University level MSW programs can offer supervision and/or USBE could set up a "Supervisor Sharing Program" so one district can "share" their LCSWs with Educators Licenses with other districts.

During the summer and fall of 2018 I attempted to do a Social Work Educators Practicum in the Wayne County Schools. To my surprise, it was impossible to find a qualified supervisor. I communicated with the University of Utah on multiple occasions, as well as with about six LCSWs with Educators licenses in other districts. I was willing to enroll in and pay for the U of U practicum class, yet no one was able to supervise in part because no one had time and/or one district was hesitant to share their employees with another district.

I am very grateful Wayne County School District was willing and able to hire me for the 2019-2020 school year. In August and September of this year I spent a good deal of time, again, looking for a qualified supervisor. Again, I fell short. I feel confident that I am doing a good job for the students in Wayne County, however, I also know

having a qualified supervisor would offer an opportunity for me to be more effective in my role.

My recommendation is that USBE in collaboration with the school districts and/or the Universities offering MSW degrees have qualified LCSW Supervisors available to offer remote supervision to professionals in similar positions myself.

Please feel free to call or write to me with further questions.

Thank you,

Elizabeth McCoy, LCSW  
PO Box 750308  
Torrey, Utah 84775  
(801) 486-1272, cell

----- Forwarded message -----

From: **Tiana McCall** <[tiana0789@gmail.com](mailto:tiana0789@gmail.com)>

Date: Mon, Dec 2, 2019, 1:13 PM

Subject: R277-306

To: <[brittney.cummins@schools.utah.gov](mailto:brittney.cummins@schools.utah.gov)>, <[carol.lear@learlaw.com](mailto:carol.lear@learlaw.com)>, <[janet.cannon@schools.utah.gov](mailto:janet.cannon@schools.utah.gov)>

Ms. Cummins, Ms. Lear, and Ms. Cannon,

I am writing in regards to the administrative rule: **R277-306**.

I am a School Social Worker with Granite School District and I have been in this field for 4 years. I completed my MSW through an online program at Edinboro University and completed one of my practicum years in a school in Salt Lake School District. After I graduated it was difficult for me to obtain my educator's license because my degree came from another state. I had to obtain letters from my graduate school to verify my practicum experience and it took a long time for it to be approved. I am grateful that I was eventually granted an educator's license!

I am currently working in four schools, specifically working with students and families from refugee backgrounds. This population has unique needs that go beyond only mental health support and services. Through my work in this position I educate parents and students about the educational system in which they now live and I advocate for them to be heard and understood in the school system. I spend a large portion of my time doing home visits and in the community because those things build rapport and trust: an especially important aspect of the work that I do. Another major component of my job is consulting with teachers about how to best support the newcomers in their classrooms. If I were limited to only providing mental health services in the school all of these much needed services would not be provided.

Last year, I conducted parent workshops and parenting classes to refugee and immigrant parents. These reached 95 parents and impacted 159 students currently in the school system. During these outreach events I shared information about the way the educational system works in America, effective strategies for parenting in a new culture, self-care tools, mental health awareness, and generally provided a safe space for newly-arrived members of our community to share frustrations and questions and worries. All of this would not have been possible without my unique experience and expertise as a School Social Worker with an Educator's License.

Through my work as a School Social Worker, I am constantly engaged in work that goes beyond providing mental health services. I am truly an educator and I want to emphasize the importance of requiring educator's licenses for Social Workers in schools. My MSW program uniquely prepared me for work in the mental health field and my experience in the school setting and my qualifications to receive an educator's license have uniquely prepared me for a profession in School Social Work. As a School Social Worker I provide mental health services, education, advocacy, consultation, and community outreach. I also have to have a thorough understanding of the school system, the multi-tiered systems of support, the student support process, the IEP and 504 procedures and rules.

I implore you to truly consider the importance of social workers having educator's licenses in the state of Utah as we continue to work with students and families in the school system.

Thank you for taking the time to read this email. I look forward to hearing about the Board's decision regarding this topic.

--

Tiana McCall, CSW  
435-619-9570

**From:** Emilie Havili <[emiliehavili@gmail.com](mailto:emiliehavili@gmail.com)>  
**Sent:** Friday, December 13, 2019 1:56 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** Fwd: Hearing for R277-306

To Whom It May Concern:

My name is Emilie Havili and I am a school social worker with an educator's license. It has been brought to my attention that the Utah State Board of Education voted to eliminate the need for an educator's license for school social workers.

I am writing to request that this ruling be rescinded. I am an LCSW and worked outside of a school setting for years before working in the school setting. The work I do in the school is very different than what I did as an LCSW outside of the school.

I received training during my Master's program and worked in a school setting doing classroom presentations and education on different topics related to mental health, but also to help foster educational growth. In my current position, I work at all Tier levels and have been able to identify growth related to my services to an entire grade level in an educational setting that would not have been provided had I only seen individual students in individual sessions.

An educator's license, and the training to obtain that license, provides social workers with knowledge and skills specific to a school setting. Many specializations within the social worker field require specialization training and certification such as drug and alcohol, abuse, etc. This is the same with school social work; specific training and certification is needed. School social workers need an educator's license because in addition to being mental health providers, we are educators and need that license to be able to provide services to all students.

I currently support over 850 students at my school in different capacities. As only an LCSW, I could see about 15-20 students every 12-15 weeks, about 60 students a year. That is a huge difference especially with the mental health crisis we are currently seeing here in Utah.

I ask for your vote to rescind this ruling and continue to require school social workers to hold an educator's license.

Thank you for your time.

Sincerely,

**Emilie C. Havili, LCSW**



**From:** Petersen, Judith A <[japetersen@graniteschools.org](mailto:japetersen@graniteschools.org)>  
**Sent:** Friday, December 13, 2019 3:49:12 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Cc:** Miller, Andrea T <[amiller@graniteschools.org](mailto:amiller@graniteschools.org)>  
**Subject:** R277-306

To Whom it May Concern:

As direct supervisor for 66 educator licensed school social workers, I would like to comment in opposition to the proposed changes to R277-306.

It is important to consider **school social workers** as education-based not agency-based professionals. There's a big difference in how social workers deliver their services in schools versus an agency. School social workers are staffed in Granite School District at 1:1000 at the elementary level and 1:2000 at the secondary level. Agency social workers are assigned a caseload of clients and meet with eight or fewer clients on any one day while school social workers view their work from a school-wide, entire student body perspective and may work with classrooms of 30 plus students two to three times in one day. In my opinion, an educator license presents a "value added" requirement, specific and unique to social workers who work in schools and clearly separates them apart from those who pursue a license only through DOPL. School social workers do "school work" – classroom instruction and management, behavior interventions and crisis response where every client is pre-K thru grade 12. An educator license aligns the social worker skill set with other licensed educational professionals and prepares them to work collaboratively as a member of a school's student support team.

Granite School District is currently a recipient of the USBE's elementary counseling mental health grant. This grant is specifically designed to hire additional mental health personnel – counselors, psychologists, or social workers. Granite District leaders chose to hire licensed social workers with grant funds because their knowledge and content skill in areas in social and emotional learning, trauma informed care, and crisis response best met our need.

I hope my words will be considered in rescinding R277-309 and restoring a license requirement for social workers, those in the field who intentionally elect to work in a public education setting.

Thank you!

Respectfully,

*Judy Petersen*

Director, College and Career Readiness  
Granite School District  
2500 South State Street  
Salt Lake City, UT 84115  
[japetersen@graniteschools.org](mailto:japetersen@graniteschools.org)  
Office (385) 646-4408  
Cell (801) 652-4067

**From:** Sanchez, Sherrie <[ssanchez@graniteschools.org](mailto:ssanchez@graniteschools.org)>

**Sent:** Tuesday, December 3, 2019 1:03 PM

**To:** [mike.haynes@schools.utah.gov](mailto:mike.haynes@schools.utah.gov)

**Subject:** R277-306

Dear Mr. Haynes,

I am a school social worker in Granite School District. I am also a LCSW (licensed clinical social worker) and have worked in private practice, mental health inpatient and outpatient facilities, medical social work and Employee Assistance Programs (managed mental health care) over the course of my career. I have found that school social work is my lifelong work and passion and have been serving students and families for the past 16 years in Granite schools. I have mentored 11 social work masters students as well (who have done internships under my supervision).

I am writing today to address a recent change to Utah law around educator licenses for social workers in the school. I understand the intent was to improve ease of becoming a school social worker. I disagree with the decision and think there may have been some oversights in making the decision without all the information on how it would impact the professionals who serve in our schools. We serve a dual purpose as mental health professionals and educators.

My past experiences give me a little knowledge to speak on the matter that school social work is much different from outpatient or inpatient clinical work. Social work is broad work and spans the lifetime, and macro to micro levels. I use my clinical skills daily and am grateful that I have them, but I consider myself to be an educator and see things through an education lens. I completed an intership in a school setting, have learned the school system, speak the school language (which is a very complex language) and understand the marriage between community and school based services. I actively go between parents, administration, teachers and students to help meet the needs of many, but I have to understand and be a part of the education system in order to hold any credibility to bridge those gaps. My educator license keeps me and other social workers relevant in the education world. It allows us to access training that teachers have access to to help us understand their world better and the expectations of students. It keeps us current with best practices in PBIS, MTSS, Student support processes, special education laws, IDEA, student teaching and learning, working with diverse learners etc. My educator license makes me a part of the teacher union, and helps me to stand with teachers more cohesively. My educator license not only has me complete training in ethics, suicide prevention or complete CEU's in my field, but has me continuing my education to be a better educator. Much of my work is in classrooms, providing instruction and educational information on social and emotional learning - this is not covered in my LCSW license. I need to understand classroom dynamics and management, this is not covered in my LCSW license. I need to mentor teachers, this is not covered in my LCSW license. I need to provide 504 accommodations and implement learning interventions, this is not covered in my LCSW license.

I know we have a hearing this week and we will present more information to the board at that time, but I urge you to reconsider the ruling. Future social workers will not want to come into

this very specialized work without a supportive network that sets them up for career success. Without my mentorship (interning), I would not have many of the skills necessary for this job. Without opportunities for continued learning, I would not grow as an educator and without the educator license this would no longer be available to me. I think about future social workers and want to continue to mentor them, but as the law was written this limits new graduates coming into the school social work field until they get their LCSW license, which will take 3-4 years post graduation to attain. This will make our internships less desirable and we won't be able to retain those that we spent a year training to do the work.

I hope that our voices are heard and that a reconsideration of the rule will be made.

Thank you for your time,

Sherrie Sanchez, LCSW

School Social Worker

801-699-2641

**From:** Tammy Zundel <[tammyz@provo.edu](mailto:tammyz@provo.edu)>  
**Sent:** Friday, December 13, 2019 4:46:00 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** R277-306

I am providing feedback regarding School Social Work licensing rule R277-306. I support School Social Workers retaining an educator license and oppose the version of R277-306 that was recently passed removing Educators Licenses from School Social Workers.

I believe that the decision to remove Educators License from School Social workers was made prematurely without proper research as it relates to the breadth and depth of it's impact.

I and many of my fellow social workers throughout the state were contacted by USBE and asked for our input on possible new R277-306-4 rules as it related to Educator Licensed School Social Workers. We spent hours working on a way to integrate the needs of our urban and rural districts and the education requirement required for school social workers. We were surprised to see that when the new R277-306 was adopted, school social workers were left out of the new rules, with no explanation.

School Social Workers need a Division of Occupational and Professional Licensing or DOPL license which allows us to practice clinical mental health in any setting. An educator's license allows a school social worker to pursue various degrees (such as those in educational administration). It also provides equality and protection in an educational setting.

In my previous district I was hired to fill in for Utah's shortage of school psychologists. Not only was I required to work with the students receiving special education services, but also every general education student who needed services. I was a case manager for students with IEP's. I provided services, tracked goals, and ran IEP meetings. Yet with this new rule, I am not allowed an educator's license, but a school psychologist is allowed the privilege of a school psychologist. This makes no sense and even feels like I am being discriminated against. Why am I not given equal protections benefits that come with the educator's license? If they qualify for the right for an educator license, so do we.

We are educators. Every single day we educate within a three tiers of the MTSS model. No one that I work with would not say we are not educators. But I am not just an educator. I also have a school internship and the education needed to earn my educators license. I know the difference between an IEP and a 504. I know what rules and laws that these are based upon the protections that students have under these laws. I understand FERPA. I know how to provide services within a school setting that a social worker with a DOPL only license does not understand.

The rule proposed at the USBE board meeting on December 5th outlines a way for both rural and urban schools to *hire highly qualified* social workers. Since it was drafted with input from both rural and urban school districts, who represent the majority of school social workers in Utah

and agreed upon by ALL of the districts represented, we feel it is reasonable to ask that you *truly* consider our proposal and reverse the decision to remove our educators license.

Removing our license will NOT bring more qualified social workers into the school field, but may actually limit those who apply to work in the education setting. Why would a social worker apply, knowing that they are not allowed the same protections, as other mental health providers in the same setting? Why would they apply if they are often required to do more than other mental health providers, yet not have equal representation, pay, mobility, etc.

I work hard. I work long hours. I advocate for my students. I understand the educational setting and spent additional time to learn what was required to earn my educational license. Please, allow the same for future students. Allow them to have a highly qualified School Social Worker to help and support them.

Thank you for your time

--

Tammy Zundel MSW, CSW  
School Social Worker

**Provost Elementary**

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**Wasatch Elementary**

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**From:** Heninger, Kaitlin K <[kkheninger@graniteschools.org](mailto:kkheninger@graniteschools.org)>  
**Sent:** Friday, December 13, 2019 4:40:14 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** R277-306

I am a School Social Worker with Granite School District, in West Valley. I'm concerned about what the proposed rule R277-306 could mean for School Social Work in Utah, and want to urge USBE to vote to continue allowing School Social Workers to obtain Educator Licenses.

There are many different and distinct roles played by Social Workers in schools, which are *very* different from the role of LCSWs in other practices. Many of these roles are dependent upon holding an Educator's License, and I worry that School Social Workers would not have the ability to be as far reaching in their efforts, if they no longer hold those licenses in the future. I have a few main points I would like to share about why this is important to us.

I feel fortunate to be able to interact with students, teachers, and parents to support students at an individual level, as well as school-wide. I receive calls daily from parents on a variety of concerns. This includes not only emotional well-being, but also academics, attendance, and general school or classroom concerns. I am expected to understand District policies, the basics of classroom procedures and curriculum, and the potential impact of daily school activities on students. School Social Workers are often used as a lifeline to parents to receive support in navigating and effectively communicating with the school system. Social Workers in our schools are not viewed as a separate entity available to provide mental health support, but rather as an integrated piece of their child's education system.

Fundamentally, I consider much of the work that we do in schools to be that of an educator. At Rolling Meadows, we have built in social emotional learning as part of our regular classroom rotation schedules. Research shows that students' self-control and ability to regulate emotions and behavior is more predictive of success than IQ. I and many other social workers in GSD regularly create, compile, and teach lessons for classrooms of students, just as an educator would. The objectives of these lessons align with core standards, and build student success in the classroom.

In schools, we are also able to use our knowledge of child development and mental health not only to support students within our office, but first-hand within the classroom, and as a team member with parents, teachers, and other support staff. We balance a blended model of support by playing a distinct integral role of many of the schools' teams. We use our training on brain development and behavior to give input on school-wide efforts in Positive Behavioral Intervention and Support (PBIS) to implement effective and long-lasting programs and procedures. We also play important roles on MTSS and Special Education teams. We write and implement behavior intervention plans that operate within classroom parameters, and coincide with IEP goals. We also regularly conduct behavior observations and assessments that are informational pieces of Special Education evaluations. We need to have a broad understanding of Special Education in order to effectively support these teams as expected. We work as partners with our Psychologists, and sometimes on our own, to add valuable information and ideas on child development and behavior to evaluate students for Special Education and support many of our most challenging and complex students.

In these different settings, our role as an educator within the system is emphasized. Because of our many roles and responsibilities, we are viewed as an integrated piece of the school, there to

serve and support the school as a whole. Because of this, being a Licensed Educator is vital to our roles and our ability to support students. This is the same with School Psychologists, Speech Language Pathologists, Counselors, and other support personnel who carry Educator Licenses. I hope that USBE agrees with this position and continues to allow Social Workers to hold this credential, along with our colleagues. Thank you for your time and consideration.

Sincerely,

*Kait Heninger*

School Social Worker

Rolling Meadows Elementary

(385) 646-8202

I hope that I can remain anonymous, this is just my experiences and observation. We have had a very difficult time finding LCSW that are licensed with DOPL and the educational system. We have had mental health support in our schools for two years. Our first year of having mental health services, we had 4 applicants, 1 LMFT (who had previous ethical issues with students), 2 SSW (Social Service Workers, 1 with 20 years of experience in the field of social work, case management, facilitating and advocating for students and families as well as Special Education License.) Another SSW, with little to no experience and one other applicant with no DOPL license. The second year, we had 4 applicants; the previous LMFT who had ethical issues, 2 applicant that were not licensed by DOPL with little to no experience, along with 1 LCSW with minimal medical/discharge planning experience, no community/mental health experience with groups/individual therapy.

My thoughts would be to maintain the ideal requirements of an LCSW with school based mental health service experience. However, I believe in rural areas we are going to have to have a very difficult time filling positions with the current requirements. I believe there needs to be an option to under-fill the position if needed, with a BSW/SSW to provide some metal health services. It would be helpful. but not necessary under an SSW scope of license (DOPL) to be supervised by an LCSW. Due to the fact that the school system in not a mental health facility, SSW do not need to be supervised under SSW scope of practice. BSW/SSW would not be able to provide masters level therapy services, but could provide life skills/social skills groups, tier 1 crisis assessment referring to a clinician/medical person in the community to complete full crisis assessment. Also referring students and families to masters level therapists within the community mental health agencies to provide individual and group therapy. It would also be helpful if we had a route for BSW/SSW to become LCSW or school endorsement if licensed as an educator that meets the requirements for a School Social worker, similar to the new endorsement for SpEd-EEE.. If we have this secondary option it will still provide advocacy/referral and resources for students and families. Just some thoughts, thank you for the opportunity to provide feedback.

Anonymous Special Education Director