November 13, 2015

Re: Sections 52.21, Part 80 and 100.2(j) of the Commissioner’s Regulations relating to School Counseling

Dear Regent Johnson:

Together we, the New York State School Social Workers’ Association (NYSSSWA), the National Association of Social Workers - New York State Chapter (NASW-NYS), and the New York State Society for Clinical Social Work (NYSSCSW), represent thousands of licensed social workers across New York State.

Jointly, we request that you delay implementation of changes to the above referenced Commissioner’s Regulations until the conclusion of dialogue with a more inclusive body of individuals representing all professions traditionally tasked with providing the activities and services set forth in the comprehensive developmental school counseling programs. Allowing for such discussion will permit the creation of a cohesive, comprehensive plan that embodies best practices for those serving the needs of all P-12 students in New York State. Including school psychologists, school guidance counselors and school social workers in this discussion will create more informed regulations.

We respectfully request that the Regents employ a more comprehensive and collaborative approach before moving forward.

We appreciate your attention to this matter.

Sincerely,

Hai-Ping Yeh, LCSW-R
President of NYSSSWA

Peter Chernack, DSW, LCSW-R
President of NASW-NYS

Marsha L. Wineburgh, MSW, DSW, LCSW, BCD
President of NYSSCSW