

April 19, 2010

Jo Carter, BSN, RN, CCM
Chair
Commission for Case Manager Certification
P.O. Box 17009
St. Paul, MN 55117

RE: CMSA Standards of Practice

Dear Ms. Carter:

On behalf of the 150,000 members of the National Association of Social Workers (NASW), I am responding to CCMC's March 2010 open letter regarding the recently updated standards of the Case Management Society of America (CMSA). Many NASW members work as case managers, care managers, or care coordinators. In fact, NASW's 2004 benchmark study of licensed social workers in the U.S. found that case management is a component of most social workers' jobs and that a significant number of social workers report spending more than half their time on case management. Almost 800 NASW members hold NASW certifications in case management; others hold NASW certifications in specialty areas related to case management, such as health, gerontology, or hospice and palliative care; and still other social workers hold certifications such as the CCM.

NASW collaborated closely with CMSA throughout the revision of the standards: our staff participated in the revision task force, and our members commented on the proposed draft. We are extremely pleased with the final product, and we believe the standards provide valuable and timely guidance to social work case managers across health and behavioral care settings. Thus, we were distressed to learn CCMC describe the updated standards as "a threat to public safety." This comment is not only unwarranted, but also damaging to all case managers, regardless of membership affiliation, certification, or discipline. We join CMSA in urging CCMC to retract this comment.

The qualifications standard in dispute reflects the realities of multidisciplinary case management and the current regulatory environment while upholding the professionalism of case management as a specialty practice area. NASW supports this standard for three reasons:

- Every social worker—defined as an individual with a baccalaureate or graduate degree in social work from a school or program accredited by the Council on Social Work Education—is prepared to practice as a case manager.
- State licensure laws do not cover all social workers at all levels of practice.
- The current regulatory environment supports independent assessments by both BSWs and MSWs, regardless of licensure status.

As highlighted below, the degree requirement in the CMSA qualification standard surpasses the educational requirements for the CCM:

*Baccalaureate or graduate degree in social work, nursing, or another health or human services field that promotes the physical, psychosocial, and/or vocational well-being of the persons being served. The degree must be from an institution that is fully accredited by a nationally recognized educational accreditation organization, and the individual must have completed a supervised field experience in case management, health, or behavioral health as part of the degree requirements.*¹

The field experience requirement is particularly relevant to social workers; BSWs graduate with at least 400 hours of supervised field experience and master's-level social workers with at least 900 hours. Therefore, even recently graduated BSWs enter the field prepared to fulfill multiple tasks, including case management, assessment, community outreach, crisis intervention, service planning and provision, program evaluation, and advocacy. Because of variations in state licensure, however, many social workers are not eligible for licensure. Some states license social workers from the bachelor's level through the clinical level, while others do not license BSWs or even recently graduated MSWs. Nonetheless, all individuals who possess baccalaureate or master's degrees in social work are professionals with training and significant experience in case management. Moreover, the legal requirement in the CMSA standards for the case manager to "adhere to applicable local, state, and federal laws . . . [and] to work within the scope of his/her licensure" mandates social workers to obtain licensure as soon as they are eligible in their respective states; to maintain such licensure; and to work within their areas of competence.

Current federal regulations support independent assessment by social workers at all levels of practice:

- BSWs may practice without supervision in skilled nursing facilities.²
- Both BSWs hired before December 2, 2008, and MSWs without clinical licensure may practice without supervision in hospice settings.³
- MSWs who do not have clinical licensure may practice without supervision in home health agencies.⁴

It is worth noting that NASW takes issue with allowing individuals without degrees in social work to practice social work in the three settings described above. In this respect, we support the more stringent educational qualifications of the CMSA standards of practice, which would make it difficult for individuals without social work degrees to practice case management under the title of *social worker* (or *medical social services staff*) in those settings. On the other hand,

¹ Case Management Society of America. (2010). *Standards of practice for case management*. Little Rock, AR: Author.

² 42 CFR Part 483.15(g)

³ 42 CFR Part 418.114(b)(3)

⁴ 42 CFR Part 484.4

NASW believes the inclusion of BSWs and nonclinical MSWs in these settings is both appropriate and in keeping with workforce availability. For example, licensed social workers of all levels are concentrated in metropolitan areas,⁵ and licensed BSWs are more likely to serve older adults in health care settings.⁶ Again, the CMSA legal standard mandates social workers to follow state requirements for licensure and scope of practice, while the qualifications standard provides the flexibility needed to ensure that social work case managers of all levels are recognized for their essential role in case management.

In summary, NASW supports the CMSA *Standards of Practice* as representative of an essential social work practice area and as a valuable guide for case managers of all professional backgrounds. We share CMSA's commitment to promote and improve case management services in health care, and we welcome dialogue with CCMC about this issue.

Sincerely,



Elizabeth J. Clark, PhD, ACSW, MPH
Executive Director

Cc: Cheri Lattimer, Executive Director, Case Management Society of America

⁵ Whitaker, T., Weismiller, T., & Clark, E. (2006). *Assuring the sufficiency of a frontline workforce: A national study of licensed social workers. Executive summary*. Washington, DC: National Association of Social Workers.

⁶ Whitaker, T., Weismiller, T., & Clark, E. (2006). *Assuring the sufficiency of a frontline workforce: A national study of licensed social workers. Special report: Social work services in health care settings*. Washington, DC: National Association of Social Workers.