

Report Highlights

Why DLA Performed This Audit

This audit was performed to determine if there is a continued need for the board and if its termination date should be extended. The board is set to sunset June 30, 2026, and will have one year from that date to conclude its administrative operations.

What the Legislative Auditor Recommends

1. The Office of the Governor, Boards and Commissions director should take steps to ensure board seats are filled in a timely manner.
2. The board chair and Division of Corporations, Business and Professional Licensing's director should work together to ensure renewal applicants comply with continuing education regulations or seek a change to regulations as deemed necessary.

A Sunset Review of the Department of Commerce, Community, and Economic Development, Board of Social Work Examiners (board)

April 17, 2025

Audit Control Number 08-20145-25

REPORT CONCLUSIONS

The board served the public's interest by generally conducting meetings in an effective manner and actively amending regulations. Licenses were found to be issued in compliance with state law except for licenses renewed through the online portal, which lacked adequate documentation. The audit also found one board position had been vacant for an extended period.

In accordance with AS 08.03.010(c)(21), the board is scheduled to terminate on June 30, 2026. We recommend that the legislature extend the board's termination date eight years to June 30, 2034.

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ALASKA STATE LEGISLATURE

LEGISLATIVE BUDGET AND AUDIT COMMITTEE

Division of Legislative Audit



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May 5, 2025

Members of the Legislative Budget
and Audit Committee:

In accordance with the provisions of Title 24 and Title 44 of the Alaska Statutes (sunset legislation), we have reviewed the activities of the Board of Social Work Examiners, and the attached report is submitted for your review.

DEPARTMENT OF COMMERCE, COMMUNITY, AND ECONOMIC DEVELOPMENT
BOARD OF SOCIAL WORK EXAMINERS
SUNSET REVIEW

April 17, 2025

Audit Control Number
08-20145-25

The audit was conducted as required by AS 44.66.050(a). Per AS 08.03.010(c)(21), the Board of Social Work Examiners is scheduled to terminate on June 30, 2026. We recommend that the Legislature extend the board's termination date eight years to June 30, 2034.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Fieldwork procedures utilized in the course of developing the findings and recommendations presented in this report are discussed in the Objectives, Scope, and Methodology.

A handwritten signature in black ink, appearing to read "Kris Curtis".

Kris Curtis, CPA, CISA
Legislative Auditor

ABBREVIATIONS

AAC	Alaska Administrative Code
ACN	Audit Control Number
AS	Alaska Statute
board	Board of Social Work Examiners
CISA	Certified Information Systems Auditor
CPA	Certified Public Accountant
DCBPL	Division of Corporations, Business and Professional Licensing
DLA	Division of Legislative Audit
FY	Fiscal Year

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ORGANIZATION AND FUNCTION

Board of Social Work Examiners (board)

The board was established to regulate the practice of social work in Alaska. The board is comprised of five members. State law requires one member be a licensed baccalaureate social worker, one be a licensed master social worker, two be licensed clinical social workers, and one be a public member who has never been licensed as a social worker. At least one of the licensed members must not be a federal, state, or local government employee. Exhibit 1 shows the board members as of March 31, 2025.

Alaska Statute 08.95.990(6) defines the practice of social work as “a service in which a special knowledge of social resources, human capabilities, and the part that unconscious motivation plays in determining behavior is directed, through the application of social work principles and methods, at helping individuals to achieve more adequate, satisfying, and productive social adjustments.”

Per AS 08.95.030, the duties of the board include:

- issuing licenses to qualified applicants;
- requiring continuing education be satisfied before a license is renewed;
- establishing a code of professional ethics and standards for the practice of social work;
- establishing standards for supervisors and for supervision; and
- adopting regulations as necessary for the profession of social work.

Exhibit 1
Board of Social Work Examiners
Members as of March 31, 2025
Anne Wells, Chair <i>Licensed Clinical Social Worker</i>
Vacant <i>Licensed Clinical Social Worker</i>
Amber Taylor <i>Licensed Master Social Worker</i>
Vacant <i>Licensed Baccalaureate Social Worker</i>
Stacey Stone <i>Public Member</i>

Source: Office of the Governor, Boards and Commissions.

**Department
of Commerce,
Community,
and Economic
Development's Division
of Corporations,
Business and
Professional Licensing
(DCBPL)**

DCBPL staff provide administrative and investigative assistance to the board. Administrative assistance includes budgetary services and functions such as collecting fees, maintaining files, receiving application forms, publishing notices for meetings and examinations, and assisting with board regulations.

Alaska Statute 08.01.087 gives DCBPL authority to act on its own initiative or in response to a complaint. DCBPL may:

1. Conduct an investigation to determine whether a person has violated a law.
2. Bring an action in Superior Court to enjoin the act.
3. Examine or have examined the books and records of a person whose business activities require a business license or licensure by a board listed in AS 08.01.010, or whose occupation is listed in AS 08.01.010.
4. Issue subpoenas for the attendance of witnesses and the production of records.

Alaska Statute 08.01.065 requires the department to adopt regulations that establish the amount and manner of payment of application, examination, license, investigation, registration, and other fees as appropriate.

REPORT CONCLUSIONS

In developing our conclusion regarding whether the Board of Social Work Examiners' (board) termination date should be extended, its operations were evaluated using the 11 factors set out in AS 44.66.050(c), which are included as Appendix A of this report. Under the State's "sunset" law, these factors are to be considered in assessing whether an entity has demonstrated a public policy need for continuing operations.

The audit concluded that the board served the public's interest by generally conducting meetings in an effective manner and actively amending regulations. Licenses were found to be issued in compliance with state law except for licenses renewed through the online portal, which lacked adequate documentation. The audit also found one board position had been vacant for an extended period.

In accordance with AS 08.03.010(c)(21), the board is scheduled to terminate on June 30, 2026. We recommend that the legislature extend the board's termination date eight years to June 30, 2034.

Detailed report conclusions are as follows.

The board generally conducted its meetings effectively and did not duplicate the efforts of other entities.

The board met 20 times from July 2021 through January 2025. A review of 10 board meetings found that meetings were appropriately public noticed, generally allowed time for public comment, and a quorum was consistently met. Although quorum was met for the 10 meetings reviewed, auditors became aware that a different meeting scheduled for March 10, 2025, was canceled due to a lack of quorum. Quorum was lost mainly as a result of two board vacancies; the baccalaureate social worker board seat had been vacant since May 2024 and one of the clinical social worker board member seats became vacant just prior to the meeting, leaving only three of the five seats filled. (See Recommendation 1)

As the only entity authorized to license and regulate social work examiners, the board does not duplicate the activities of another agency.

The board actively amended regulations.

The board amended regulations to implement statutory changes, improve training, and promote the knowledge and skill of licensees. Significant regulation changes included:

- establishing a temporary military courtesy license to allow qualified active-duty military members and spouses to practice as a social worker. This change expedited the licensing process for military members and spouses.
- updating continuing education requirements to include training on suicide awareness, prevention, intervention, and crisis management; and the use of audio, video, or data communications to practice teletherapy. Additionally, continuing education requirements were prorated for a first-time license renewal. These changes helped ensure licensees have adequate continuing knowledge and skills.
- adding clinical supervisor requirements and updating clinical supervision regulations to require no less than three years of experience and six hours of continuing education on supervision or supervisory practices. This change helped ensure supervisor licensees have adequate knowledge and skills.

Board related investigations were conducted in a timely manner.

A review of board related investigative activity concluded that cases were actively investigated. A total of 46 board related complaints were open or opened from July 2021 through January 2025. The audit identified that 42 of the cases were open for over 180 days during the audit period. Auditors reviewed 10 of the 42 cases that were open for over 180 days and found no unjustified periods of inactivity.

The board issued licenses in compliance with statutes and regulations, except for license renewals, which did not fully comply with continuing education documentation requirements.

Exhibit 2 on the following page shows that, as of January 2025, there was a total of 1,299 active licenses, representing a 66 percent increase when compared to the prior 2017 sunset audit. According to the board chair, the increase was due, in part, to out-of-state social workers obtaining a license to practice teletherapy and an increase in teletherapy platforms where technology is used to provide long-distance health related services.

Auditors tested 15 new licenses issued during the audit period and found new licenses were issued in compliance with statutes and regulations. Testing of five renewed licenses found that all applicants failed to submit the continuing education information required by regulations. (See Recommendation 2) Auditors also found that the Division of Corporations, Business and Professional Licensing (DCBPL) audited continuing education in a timely manner.

Exhibit 2

Board of Social Work Examiners Licensing Activity FY 22 through January 31, 2025				
	New Licenses Issued (Exclusive of Renewals)			Total Licenses as of January 31, 2025
	FY 22	FY 23	FY 24	
Baccalaureate Social Worker	8	6	5	43
Master Social Worker	57	43	49	196
Clinical Social Worker	141	132	136	1,018
Temporary License				
Clinical Social Worker	-	1	-	-
Baccalaureate Social Worker	2	3	2	6
Master Social Worker	12	6	24	36
Total	220	191	216	1,299

Source: Compiled from the DCBPL licensing database.

Board fees were not set at a level that covered regulatory costs; however, general fund allocations prevented a deficit.

The board's schedule of revenues and expenditures for FY 22 through January 2025 is shown in Exhibit 3 on page 7. The board mainly receives its revenue from licensure and renewal fees. Renewals are conducted on a biennial basis, creating a two-year cycle in board revenues. As shown in Exhibit 3, the board had a cumulative surplus of approximately \$183,000 as of January 2025. During the audit period, the board was allocated \$243,315 of general funds to replace revenue lost due to the pandemic related license fee freeze mandated by the governor. Without the general fund allocation, the board would have been in a deficit, making it clear that fees were not set at a level that covered the cost of regulating the profession. The board's schedule of fees is shown in Exhibit 4 on page 8.

Exhibit 3

Board of Social Work Examiners Schedule of Revenues and Expenditures FY 22 through January 31, 2025 (Unaudited)

	FY 22	FY 23	FY 24	July 1, 2024 - January 31, 2025
Revenues				
Licensing Fees	\$ 326,730	\$ 125,393	\$ 428,284	\$ 74,521
General Funds Received	49,705	193,197	413	-
Other Sources	-	313	568	3,000
Total Revenues	<u>376,435</u>	<u>318,903</u>	<u>429,265</u>	<u>77,521</u>
Direct Expenditures				
Personal Services	155,502	193,186	189,455	132,646
Travel	201	1,986	1,514	610
Services	24,454	23,498	6,761	2,950
Commodities	-	-	22	15
Total Direct Expenditures	<u>180,157</u>	<u>218,670</u>	<u>197,752</u>	<u>136,221</u>
Indirect Expenditures	<u>84,279</u>	<u>97,661</u>	<u>97,794</u>	<u>48,898*</u>
Total Expenditures	<u>264,436</u>	<u>316,331</u>	<u>295,546</u>	<u>185,119</u>
Annual Surplus (Deficit)	111,999	2,572	133,719	(107,598)
Beginning Cumulative Surplus (Deficit)	<u>42,590</u>	<u>154,589</u>	<u>157,161</u>	<u>290,880</u>
Ending Cumulative Surplus (Deficit)	<u>\$154,589</u>	<u>\$157,161</u>	<u>\$290,880</u>	<u>\$183,282</u>

Source: DCBPL management.

* Estimated based on the indirect allocation for July 1, 2024, through December 31, 2024.

Exhibit 4

**Board of Social Work Examiners
License and Other Fees
FY 22 through January 31, 2025**

	Fee Amount
Nonrefundable application fee:	
Initial License	\$100
Emergency Courtesy License	50
License fee for all or part of the initial biennial license period:	
Clinical Social Worker	325
Master Social Worker	275
Baccalaureate Social Worker	225
Biennial license renewal fee:	
Clinical Social Worker	325
Master Social Worker	275
Baccalaureate Social Worker	225
Temporary license fee	75
Emergency courtesy license fee	80
Initial continuing education course fee	50
Continuing education course resubmittal fee	25

Source: 12 AAC 02.155.

FINDINGS AND RECOMMENDATIONS

The prior 2017 sunset audit made two recommendations:

- The Division of Corporations, Business and Professional Licensing's (DCBPL) director should improve procedures to ensure Board of Social Work Examiners (board) required documentation is obtained prior to licensure.
- The Office of the Governor, Boards and Commissions director should work with the board to identify potential applicants for the board's vacant clinical social worker position.

The prior audit recommendation regarding improved procedures to ensure required documentation is obtained prior to licensure was resolved. Auditors reviewed 15 newly issued licenses and found all 15 were fully supported by documentation prior to licensure.

The prior recommendation to fill the vacant clinical social worker board position was resolved; however, an extended baccalaureate social worker board vacancy was identified and is addressed in Recommendation 1.

This sunset audit makes one new recommendation.

Recommendation 1:

**Office of the Governor,
Boards and Commissions
director should take steps
to ensure board seats are
filled in a timely manner.**

As of April 2025, the baccalaureate social worker board seat had been vacant for approximately 11 months. Additionally, a licensed clinical social worker board seat became vacant in March 2025. The Office of the Governor, Boards and Commissions director stated that three board applications were received in 2024; however, none of the applicants were eligible.

Per AS 08.95.010, the board is composed of five members. State law requires one member be a licensed baccalaureate social worker, one be a licensed master social worker, two be licensed clinical social workers, and one be a public member who has never been licensed as a social worker. The Office of the Governor, Boards and Commissions director is responsible for actively recruiting,

interviewing, and vetting board applicants. Vacant positions hinder the board's ability to conduct business with the appropriate perspectives and could potentially lead to inefficiencies, such as canceled meetings due to lack of quorum. The audit noted that the March 10, 2025, board meeting was cancelled due to lack of quorum.

We recommend that the Boards and Commissions director take steps to ensure board seats are filled in a timely manner.

Recommendation 2:

The board chair and DCBPL's director should work together to ensure renewal applicants comply with continuing education regulations or seek a change to regulations as deemed necessary.

Auditors reviewed five renewal applications and found that all five lacked the required continuing education documentation. Per 12 AAC 18.200, an applicant for a license renewal is required to submit a sworn statement of the continuing education contact hours completed during the concluding licensing period, which must include the following information, if applicable, for each course, seminar, or workshop:

- (A) the name of the sponsoring organization;
- (B) the location of the course, seminar, or workshop;
- (C) the title or a brief description of the course, seminar, or workshop;
- (D) the principal instructor;
- (E) the dates of attendance;
- (F) the titles, issues, and dates of publications or presentations; and
- (G) the number of continuing education contact hours claimed.

All five of the licensees renewed using the online renewal application. The online application directed licensees to certify successful completion of the required continuing education hours, but did not require that details be disclosed for each class. According to DCBPL staff, the online renewal form was created in a standardized format to be used for many boards when the division transitioned

to an online application portal. When the online form was created, DCBPL decided that detailed continuing education information would not be obtained at the time of application. Instead, DCBPL would monitor continuing education through its audit process. DCBPL management and the board did not revise 12 AAC 18.200 when that decision was made.

We recommend the board chair and DCBPL director work together to ensure renewal applicants comply with continuing education regulations or seek a change to regulations as deemed necessary.

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OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Title 24 and Title 44 of the Alaska Statutes, we have reviewed the activities of the Board of Social Work Examiners (board) to determine if there is a demonstrated public need for its continued existence.

As required by AS 44.66.050(a), this report shall be considered by the committee of reference during the legislative oversight process in determining whether the board should be reestablished. Currently, under AS 08.03.010(c)(21), the board will terminate on June 30, 2026, and will have one year from that date to conclude its administrative operations.

Objectives

The three central, interrelated objectives of our report are to:

1. Determine if the termination date of the board should be extended.
2. Determine if the board is operating in the public's interest.
3. Determine the status of recommendations made in the prior sunset audit.

Scope

The assessment of board operations and performance was based on criteria set out in AS 44.66.050(c). Criteria set out in this statute relates to the determination of a demonstrated public need for the board. We reviewed the board's activities from July 1, 2021, through January 31, 2025. Financial information is presented, unaudited, for the same period.

Methodology

During the course of our audit, we reviewed and evaluated the following:

- The prior sunset audit report (ACN 08-20108-17) to identify issues affecting the board and to identify prior sunset audit recommendations.

-
- Applicable statutes and regulations to identify board functions and responsibilities.
 - Board meeting minutes to gain an understanding of board proceedings and activities, the nature and extent of public input, whether a quorum was maintained, and whether board vacancies impeded operations.
 - Board annual reports to gain an understanding of board activities.
 - The State's Online Public Notices System to verify board meetings were adequately public noticed in compliance with state law.
 - Board expenditures, revenues, and fee levels to determine whether fee levels covered the profession's regulatory costs.
 - Various Alaska news websites to identify complaints against the board or other board related concerns.
 - Board investigation data for cases open or opened from July 1, 2021, through January 31, 2025, to assess the efficiency of the investigative process.
 - Various websites containing information for potential duplication of board activities.
 - Continuing education audits to evaluate board operations and to help determine whether the board was serving the public's interest.

Internal controls over the licensing and investigation processes were assessed to determine if controls were properly designed and implemented. Additionally, to identify and evaluate board activities, we conducted interviews with State agency staff and board members. Specific areas of inquiry included: board operations, statutory duties, regulations, duplication of efforts, fee levels, board member vacancies, and complaints against the board. Inquiry was also made with the Office of the Governor, Boards and Commissions director to determine the cause of board member vacancies and recruitment activities.

The audit utilized the following samples:

- A judgmental sample of 10 of 20 board meetings held from July 1, 2021, through January 31, 2025, was reviewed to gain an understanding of board proceedings and activities, the nature and extent of public input, whether a quorum was maintained, whether the meetings were public noticed, and whether board vacancies impeded operations. Test results were not projected to the population.
- Ten of 42 board related cases open 180 days or longer during the audit period were reviewed for unjustified periods of inactivity. Five cases were randomly selected and five were judgmentally selected. Test results were not projected to the population.
- A random sample of 20 license applications was tested. Fifteen new applications were selected from the 782 new licenses issued between July 1, 2021, and January 31, 2025. Five renewal applications were selected from the 1,323 licenses that were subject to the 2024 renewal period. The 15 new and five renewal applications were assessed for statutory and regulatory compliance. The sample size was based on low control risk, low inherent risk, and moderate audit risk. Test results were not projected to the population.

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APPENDIX SUMMARY

Appendix A provides the sunset criteria used in developing the conclusions regarding whether the Board of Social Work Examiners termination date should be extended.

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APPENDIX A

Analysis of Public Need Criteria AS 44.66.050(c)

A determination as to whether a board or commission has demonstrated a public need for its continued existence must take into consideration the following factors:

1. the extent to which the board or commission has operated in the public interest;
2. the extent to which the operation of the board or commission has been impeded or enhanced by existing statutes, procedures, and practices that it has adopted, and any other matter, including budgetary, resource, and personnel matters;
3. the extent to which the board or commission has recommended statutory changes that are generally of benefit to the public interest;
4. the extent to which the board or commission has encouraged interested persons to report to it concerning the effect of its regulations and decisions on the effectiveness of service, economy of service, and availability of service that it has provided;
5. the extent to which the board or commission has encouraged public participation in the making of its regulations and decisions;
6. the efficiency with which public inquiries or complaints regarding the activities of the board or commission filed with it, with the department to which a board or commission is administratively assigned, or with the office of victims' rights or the office of the ombudsman have been processed and resolved;
7. the extent to which a board or commission that regulates entry into an occupation or profession has presented qualified applicants to serve the public;

APPENDIX A

(Continued)

8. the extent to which state personnel practices, including affirmative action requirements, have been complied with by the board or commission in its own activities and in the area of activity or interest;
9. the extent to which statutory, regulatory, budgetary, or other changes are necessary to enable the board or commission to better serve the interests of the public and to comply with the factors enumerated in this subsection;
10. the extent to which the board or commission has effectively attained its objectives and purposes and the efficiency with which the board or commission has operated; and
11. the extent to which the board or commission duplicates the activities of another governmental agency or the private sector.

Agency Response from the Office of the Governor



OFFICE OF THE GOVERNOR

Governor Mike Dunleavy
STATE OF ALASKA

July 17, 2025

RECEIVED

JUL 18 2025

LEGISLATIVE AUDIT

Ms. Kris Curtis
Legislative Auditor
Division of Legislative Audit
P.O. Box 113300
Juneau, AK 99811-3300

RE: Confidential preliminary audit, Department of Commerce, Community, and Economic Development (DCCED), Board of Social Work Examiners

Dear Ms. Curtis,

Recommendation 1: Office of the Governor, Boards and Commissions director should take steps to ensure board seats are filled in a timely manner.

The Office of the Governor concurs that vacancies should be filled promptly when an appointable candidate exists. State law sets minimum eligibility for this board. In addition, the Governor exercises discretion to evaluate broader suitability for service. During this audit timeframe, the Director of Boards and Commissions vetted three applicants, none of the applicants were eligible. The Governor's Office maintains standing public notice of opportunities to serve. The Governor will make an appointment when a candidate meets the statutory requirements and is suitable for appointment.

Respectfully,

A handwritten signature in black ink, appearing to read "Jordan Shilling".

Jordan Shilling, Director
Boards and Commissions

cc: Cheri Lowenstein, Administrative Director, Office of the Governor

550 West 7th Avenue, Suite 1700, Anchorage, AK 99501

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Agency Response from the Department of Commerce, Community, and Economic Development



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Commerce, Community, and Economic Development

OFFICE OF THE COMMISSIONER
Julie Sande, Commissioner

P.O. Box 110800
Juneau, Alaska 99811-0800
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July 24, 2025

Kris Curtis
Legislative Auditor
Division of Legislative Audit
P.O. Box 113300
Juneau, AK 99811

RECEIVED

JUL 25 2025

LEGISLATIVE AUDIT

Dear Ms. Curtis:

Thank you for the June 30, 2025, Confidential Preliminary Report, Department of Commerce, Community, and Economic Development (DCCED), Board of Social Work Examiners (board) Sunset Review. I concur with all five conclusions and both recommendations. Please see the following comments regarding the recommendations:

Recommendation #1: Office of the Governor, Boards and Commissions director should take steps to ensure board seats are filled in a timely manner.

The department will continue to support the governor's office in filling vacant board seats, as appropriate.

Recommendation #2: The board chair and DCBPL's director should work together to ensure renewal applicants comply with continuing education regulations or seek a change to regulations as deemed necessary.

The division concurs with this finding and will work with the board to discuss whether it wishes to amend 12 AAC 18.200 so that it better aligns with the division's normal process to ensure compliance with continuing education requirements. The division has edited both the paper and online renewal forms to include the information required in 12 AAC 18.200. We appreciate the audit highlighting this deficiency in our process for us.

Again, thank you for the opportunity for the department to provide input on this matter. If you have any questions, please feel free to contact me.

Sincerely,

DocuSigned by:
A handwritten signature in blue ink, appearing to read "Julie Sande".
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Julie Sande
Commissioner

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Agency Response from the Board of Social Work Examiners

July 22, 2025

Kris Curtis, Legislative Auditor
Legislative Budget and Audit Committee
Division of Legislative Audit
PO Box 113300
Juneau, AK 99811-3300

RECEIVED
JUL 22 2025
LEGISLATIVE AUDIT

Dear Legislative Budget and Audit Committee:

This is the written response to the April 17, 2025 Confidential Preliminary Report, Department of Commerce, Community, and Economic Development (DCCED), Board of Social Work Examiners Sunset Review. I will respond to the recommendation and will state if I agree or disagree with the report's conclusions and recommendations.

Recommendation #1: Office of the Governor, Boards and Commissions director should take steps to ensure board seats are filled in a timely manner.

I agree with this recommendation. Vacant positions have led to delays in processing applications and cancelled meetings due to lack of quorum, and delays with closing out investigations. The board will continue to support efforts in filing vacant board seats, as appropriate.

Recommendation #2: The board chair and DCBPL's director should work together to ensure renewal applicants comply with continuing education regulations or seek a change to regulations as deemed necessary.

When the division transitioned to an online application portal, the online renewal form was created in a standardized format, which did not include additional information about the continuing education contact hours, such as (but not limited to) the name of the sponsoring organization, the title of the course, the dates of attendance, and the number of continuing education contact hours as per 12 AAC 18.200. The board chair will work with the DCBPL's director to ensure that the online renewal process complies with regulations.

Report Conclusions:

I agree with the report conclusions. The Board of Social Work examiners remains committed to serve the public's interest by ensuring that social workers meet and maintain the highest standards of professional and ethical practice.

Thank you for the opportunity to respond to the report.

Sincerely,

Anne Wells

Anne Wells, LCSW, LCAS, LPC-S
Chair, Alaska Board of Social Work Examiners

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