Chapter 7 Rule on Uniform Data Set and Adverse Actions

Effective Date, Technical Revisions and Challenge Period: Pursuant to Section 12.K.(3) of the Compact, this Rule was adopted by Commission vote on November 4, 2026, subject to non-substantive technical revisions delegated to the Compact Commission's legal counsel pursuant to Chapter 1, Section 2.0 of the Commission's Rules.

Pursuant to Chapter 1, Section 2.0 of the Commission's Rules, non-substantive revisions shall be subject to challenge by any person for a period of thirty (30) days after posting. The revision may be challenged only on grounds that the revision results in a material change to a Rule. A challenge shall be made in writing and delivered to the Commission prior to the end of the notice period. If no challenge is made, the revision will take effect without further action.

This Rule shall be effective on December 25, 2026 unless any person institutes a challenge to the Rule's non-substantive revisions as set forth hereinabove.

Reason for Rule: To implement Sections 11 and 12 of the Social Work Licensure Compact by specifying the uniform data elements, reporting timelines, access controls, dispute processes, and technical requirements for the Commission's centralized Data System.
Authority: Section 9, Section 11, and Section 12 of the Social Work Licensure Compact.

7.0 Purpose

Pursuant to Section 9, Member States have the authority to take Adverse Action against a Regulated Social Worker. Pursuant to Sections 11 and 12, the Commission shall establish binding requirements for the development, maintenance, utilization, and governance of the coordinated Compact Data System, ensuring consistent, secure, and transparent reporting across Member States.

7.1 Definitions

Definitions not set forth in this Rule shall have the same meaning as the Model Compact Language. As used in this Rule:
"Adverse Action" means any administrative, civil, equitable or criminal action permitted by a State's laws which is imposed by a Licensing Authority or other authority against a Regulated Social Worker, including actions against an individual's license or Multistate Authorization to Practice such as revocation, suspension, probation, monitoring of the Licensee, limitation on the Licensee's practice, or any other Encumbrance on licensure affecting a Regulated Social Worker's authorization to practice, including issuance of a cease and desist action.

“Data System” means a repository of information about Licensees, including continuing education, examination, licensure, Current Significant Investigative Information, Disqualifying Event, Multistate License(s) and Adverse Action information or other information as required by the Commission.

“Compact Unique Identifier” means the immutable, person-based identifier assigned by the Compact Data System to each Regulated Social Worker upon issuance of a Multistate License, which shall be unique to each individual and distinct from such individual’s social security number or other government-issued identification number.

“Current Significant Investigative Information” means (1) Investigative information that a Licensing Authority, after a preliminary inquiry that includes notification and an opportunity for the Regulated Social Worker to respond has reason to believe is not groundless and, if proved true, would indicate more than a minor infraction as may be defined by the Commission; or (2) Investigative information that indicates that the Regulated Social Worker represents an immediate threat to public health and safety, as may be defined by the Commission, regardless of whether the Regulated Social Worker has been notified and has had an opportunity to respond.

“Encumbrance” means a revocation or suspension of, or any limitation on, the full and unrestricted practice of Social Work licensed and regulated by a Licensing Authority.
“Model Compact Language” means the model language for the Social Work Licensure Compact to which all Member States must substantively adhere and adopt, which may be found at the Compact website as maintained by the Commission.

“Multistate Authorization to Practice” means a legally authorized privilege to practice, which is equivalent to a license, associated with a Multistate License permitting the practice of Social Work in a Remote State.

“Multistate License” means a license to practice as a Regulated Social Worker issued by a Home State Licensing Authority that authorizes the Regulated Social Worker to practice in all Member States under Multistate Authorization to Practice.

“Record Identifier” means the unique, non-public identifier assigned by the Data System to each individual when information identifying that individual is first submitted, which shall be distinct from such individual’s social security number or other government-issued identification number.

7.2 Commission Data System

The Commission shall provide for development, maintenance, operation, and secure access to the Data System, which shall contain requisite licensure, adverse action, and investigative information on individuals to whom the Compact applies. The system shall adhere to the specifications set forth in this Rule and such other technical specifications

as may be necessary for the complete, accurate and secure maintenance of the Data System.

All data submitted by a Member State to the Data System remains the property of that Member State, and submission does not transfer ownership to the Commission or to anyone providing services to it. State ownership does not limit the Commission's duties to maintain, use, and certify records, or any Member State's access, under the Compact and Commission Rules. Any use of the data in the Data System, other than that authorized by the Compact or Commission Rules, or expressly allowed by the Commission consistent with the Compact and Commission Rules, is prohibited. Records generated by or on behalf of the Commission, including Compact Unique Identifiers and Record Identifiers, are Commission records; their creation does not transfer ownership of the underlying Member State data.

7.3 Uniform Data Set Required Fields

Member States shall submit the following data, as applicable, in a uniform format for individuals who have been issued a Multistate License by their Home State and individuals whose applications for a Multistate License have been denied, and may submit the same data for other Regulated Social Workers they license and for applicants for a social work license, which the Data System shall accept and maintain:

A. Identifying Information
   1. Social Security Number (or alternate government-issued ID)
   2. First Name (s)
   3. Middle Name (s)
   4. Last Name (s)
   5. Suffix (if any)
   6. Professional, former or maiden name(s) (if any)
   7. Date of Birth
   8. Email Address
   9. Address of Primary Residence
   10. Military Status

B. Licensure Data

If information differs between the Multistate License and the Single State License, Member States shall submit both:

   1. Home-State Jurisdiction
   2. State License Number (Single State and Multistate)
   3. License Category
   4. Initial Issuance Date
   5. Most Recent Renewal Date
   6. Expiration Date
   7. License Status (Active/Inactive)

8. Compact Eligibility (Yes/No)

C. Adverse Actions, Investigative Information, and Alternative Programs

1. Adverse Actions against any license, Multistate License, or Multistate Authorization to Practice held by the individual, and information related thereto, including but not limited to:
    a. Encumbrance Status; and
    b. Effective Dates of All Adverse Actions;
2. The presence of Current Significant Investigative Information; and
3. Non-confidential information related to Alternative Program participation, the beginning and ending dates of such participation, and other information related to such participation not made confidential under Member State law.

D. Other

1. Corrections to any previously submitted data
2. Any denial of application for licensure, and the reason(s) for such denial
3. Any additional elements the Commission adopts by Rule

Submission of denial information shall not, by itself, constitute an Adverse Action, Encumbrance or modification of any license or Multistate Authorization to Practice status.

Upon issuance of a Multistate License to a Regulated Social Worker, the Data System shall assign such individual a Compact Unique Identifier, regardless of how the Home State structures its license records. The Compact Unique Identifier is immutable and shall not be recycled. Regardless of change in an individual's data (including but not limited to their name, license number, home-state designation, or social security number or other government-issued identification number), the individual's original Record Identifier and Compact Unique Identifier remain linked to all historical and future records for that individual. If records are later found to belong to more than one individual, or one individual's records are found under more than one identifier, they shall be separated or combined, as the case may be, and the change documented. An individual with more than one identifier keeps the one assigned first. No identifier shall be moved from one individual to a different individual. Denial information shall be linked to the individual's Record Identifier. The Data System shall provide each identifier to the Licensing Authority that submitted the individual's data.

7.4 Member-State, Commission, and Administrative Access

A. Regulatory staff of Member States, upon authentication, shall have access to view:

Identifying information and licensure data;

All Adverse Action records for Regulated Social Workers, including Remote State Adverse Action details;

Presence of Current Significant Investigative Information from other Member States; and
Non-confidential Alternative Program participation information.

B. Data may be exported from the Data System only with the approval of the Executive Committee, which shall identify the data, purpose, and recipient. An export to any recipient other than a Member State, the Commission, or a successor the Commission designates in writing to operate the Data System also requires the written consent of each Member State whose data is included, and consent does not authorize any disclosure the Compact or applicable law prohibits. A person or entity providing services to the Commission may prepare an approved export only on the Commission's behalf, may deliver it only to the Commission, to a recipient approved under this subsection, or to a successor the Commission designates in writing to operate the Data System, and may not retain or use it for any other purpose. Each approved export shall be reported to the Commission at its next meeting. This subsection does not limit access under subsection A or a Member State's access to its own data.

C. The Compact Data System stores the presence of Current Significant Investigative Information and Adverse Action records. Data uploads from the Member States shall not include investigative case files or other similar investigative information. The underlying investigative documents and materials are held by the originating Member State. Requests for information related to records not maintained by the Data System shall be directed to the relevant Member State.

7.5 Home State Adverse Action Procedures and Data System Requirements

A. Upon taking Adverse Action against a Multistate License, the Home State shall report the action to the Compact Data System immediately, and in no event later than seven (7) business days following the effective date of the Adverse Action.

B. The Home State's report to the Compact Data System shall include:

1. The type of Adverse Action;
2. The effective date of the Adverse Action;
3. The type of Encumbrance, if any;
4. The effective date of the Encumbrance, if any; and
5. The date any Encumbrance is removed and the Multistate License is restored to active status, when applicable.

C. Reporting an Adverse Action against a Single State License shall not, by itself, constitute an Encumbrance against a Multistate License or Multistate Authorization to Practice. The Home State shall determine whether an Adverse Action against a Licensee or Encumbrance on a Single State License affects the individual's eligibility for, or encumbers, the corresponding Multistate License under the Compact, and shall report that determination with the Encumbrance, and any later change or restoration,

consistent with Section 7.3. Nothing in this item limits a Member State's authority to act separately under the Compact and State law.

D. Upon receipt of an Encumbrance from a Home State, the Compact Data System shall immediately reflect deactivation of the Regulated Social Worker's Multistate Authorization to Practice in all Member States.

D. The Compact Data System shall notify all Member States of the Home State Adverse Action and the resulting deactivation of the Regulated Social Worker's Multistate Authorization to Practice in all Member States immediately upon recording the action.

E. A Home State Adverse Action shall change the Regulated Social Worker's public lookup authorization status from "Active" to "Inactive." The Regulated Social Worker shall remain visible in the public lookup, and change in a Regulated Social Worker's active status shall not remove such individual from the lookup. The fact of deactivation and its effective date shall be publicly visible. The reason for deactivation and any underlying Current Significant Investigative Information shall not be publicly visible.

F. When all Encumbrances are removed and the Home State restores the Multistate License to active status, the Home State shall report the restoration to the Compact Data System immediately. The Compact Data System shall restore the Regulated Social Worker's Multistate Authorization to Practice in all Member States and update the public lookup authorization status to "Active." The date of such action shall be recorded.

G. Subsections C and E, and the deactivation described in subsection D, apply only when a Home State Adverse Action imposes an Encumbrance on the Multistate License. A Home State Adverse Action that imposes no Encumbrance, such as an unconditional reprimand or admonishment, shall be reported and sent to all Member States as this Section provides. Notwithstanding Section 7.7(B)(3), and subject to Compact Section 11(F), the fact of such discipline shall be shown as discipline status in the public lookup. Such Adverse Action shall not, by itself, deactivate the Regulated Social Worker's Multistate Authorization to Practice or change the public lookup authorization status from "Active" to "Inactive."

7.6 Remote State Adverse Action Procedures and Data System Requirements

A. Upon taking Adverse Action against a Regulated Social Worker's Multistate Authorization to Practice, the Remote State shall report the action to the Compact Data System immediately, and in no event later than seven (7) business days following the effective date of the Adverse Action.

B. The Remote State's report to the Compact Data System shall include:

1. The Remote State taking the action;
2. The type of Adverse Action;
3. The effective date of the Adverse Action;
4. The type of Encumbrance, if any;
5. The effective date of the Encumbrance, if any; and
6. The date any Encumbrance is removed and the Multistate Authorization to Practice in the Remote State is restored to active status, when applicable.

C. An Adverse Action against a Single State License that imposes no Encumbrance shall not, by itself, change the status of a Multistate License or Multistate Authorization to Practice. A Remote State reporting an Encumbrance on its Single State License shall state whether, and to what extent, the action also affects the Multistate Authorization to Practice in that State, consistent with State law and due process, and shall report any resulting Adverse Action consistent with Section 7.3. Nothing in this item limits a Member State's authority to act separately under the Compact and State law.

D. Upon receipt of an Adverse Action report from a Remote State, the Compact Data System shall notify the Home State and all other Member States of the action. Notification shall occur immediately upon recording the action.

E. A Remote State Adverse Action does not automatically deactivate the Regulated Social Worker's Multistate Authorization to Practice in other Member States. The Compact Data System shall record the Encumbrance as applying to the acting Remote State only.

F. The Encumbrance on the Regulated Social Worker's Multistate Authorization to Practice in the Remote State shall be visible in the public lookup for that State. The Regulated Social Worker's authorization status shall remain "Active" for all other Member States, subject to other Encumbrances that may be recorded by other Member States consistent with this Rule.

G. A Remote State Adverse Action report does not compel the Home State to take action against the Multistate License. If the Home State determines that Home State Adverse Action is warranted following receipt of a Remote State Adverse Action notification, the Home State shall proceed under Section 7.5 of this Rule. If another Remote State determines that Adverse Action on the Licensee's Multistate Authorization to Practice in that state is warranted following receipt of another Remote State Adverse Action notification, such other Remote State shall proceed under this Section 7.6.

7.7 Public Lookup and Licensee Access

A. The Data System's public lookup shall display, for each Regulated Social Worker who holds or has held a Multistate License, the following information:

1. Name;
2. Home State;
3. License Category;
4. State License Number;
5. Compact Unique Identifier;
6. Multistate License Status (i.e., Active/ Inactive);
7. Multistate Authorization to Practice Status (i.e., Active/Inactive)
8. Multistate License Change History
9. Issuance Date;
10. Expiration Date; and
11. Discipline status (e.g., Encumbrance, etc.).

B. The following information shall not be publicly accessible through the Compact Data System:

The presence of Current Significant Investigative Information;
The underlying reasons for, or investigative materials related to, any Adverse Action;
Details of Member State Adverse Actions beyond the existence of a restriction in the named Member State; or
Expunged information.

7.8 Home-State Verification

The Home-State Licensing Authority is responsible for verifying submission accuracy and completeness before or concurrent with license issuance.

7.9 Confidentiality of Current Significant Investigative Information

The presence of Current Significant Investigative Information may be viewed only by Member-State authorized users and not disclosed publicly in any manner.

7.10 Reporting Cadence

All data submissions other than reporting of Adverse Actions shall occur at least once per week. Reporting of Adverse Actions shall be reported in the timeline consistent with Sections 7.5 and 7.6 of this Rule.

7.11 Data Dispute Process

Licensees asserting data inaccuracies must petition the applicable State Licensing Authority and follow the substantive and procedural requirements set forth under applicable State law. Upon a determination a data inaccuracy has occurred, Member States shall update the Data System accordingly consistent with the timelines set forth elsewhere in this Rule, as applicable.

7.12 Expungement and Data Removal

Data required by law to be expunged shall be removed from the Data System by the Commission within five (5) business days of receiving the request. Expunged information shall not be presented in the public lookup or in any Compact Data System output accessible to Member States.

7.13 Technical Standards Reference

All routine data submission and Adverse Action reports shall conform to the Application Programming Interface (API) or Comma Separated Values (CSV) accepted by the Commission.

7.14 Commission Record Certification

The Commission may certify records and information of the Commission contained in the Data System as authenticated business records of the Commission pursuant to Section 10(C)(7) of the Model Compact Language.

7.15 Reporting Compliance

A. Member States that fail to meet reporting requirements under this Rule shall be subject to the compliance procedures set forth in Section 13 of the Model Compact Language.

B. The Commission may provide technical assistance and establish reasonable cure periods for reporting deficiencies.

C. Persistent failure to submit required data may constitute grounds for a finding of default under the Compact, subject to the procedures and remedies set forth in the Model Compact Language.