

**Abrown\_Senate Finance Committee\_SSWExam.pdf**

Uploaded by: Aaraa Brown

Position: FAV

## Dear Members of the Senate Finance Committee,

My name is Aaraa Brown, B.Ed., and I am a proud Black woman, a former educator, and a current social work student. I am writing to urge you to codify the workgroup recommendations and issue a favorable report for SB379. This bill will increase accountability for the Board of Social Work Examiners (BSWE) by adding two more consumer members and create a more equitable path to social work licensure—without sacrificing the competence and integrity of the profession.

As a former teacher and a future social worker, I have seen firsthand how systemic barriers disproportionately impact Black and Brown professionals who are eager to serve their communities. The 2022 data released by the Association of Social Work Boards (ASWB) exposes alarming disparities in social work licensing exam pass rates. The numbers are staggering: first-time pass rates for white candidates are around 84%, while only 45% of Black candidates and 64% of Hispanic candidates pass on their first attempt. These disparities are not a reflection of competence, but of long-standing biases embedded in standardized testing—biases that have historically shut out marginalized communities from professional opportunities.

Maryland took an important step by forming a Social Work Licensing Workgroup in 2023 to examine these disparities. The workgroup, after hearing from a diverse range of experts—including ASWB representatives, a nursing exam specialist, and social work leaders from states that have reformed licensure—determined that removing the exam requirement at the Bachelor's (LBSW) and Master's (LMSW) levels is the most equitable and effective way forward.

When we allow a single, biased exam to serve as the ultimate gatekeeper to this profession, we deprive marginalized communities of representation in social work. Based on ASWB's own data from 2011-2021, Maryland could have had an additional **1,227 licensed social workers** if all demographic groups had passed the exam at the same rate as white candidates. Imagine the impact these professionals could have had in our hospitals, schools, foster care agencies, and community mental health centers. The clients who need social work services the most—Black and Brown communities, non-English speakers, low-income families—deserve a workforce that reflects their lived experiences.

ASWB has had 40 years to prove that its exams are linked to safe and effective social work practice, yet it has never been able to do so. Social work is a deeply relational and person-centered profession—one that cannot be measured by multiple-choice questions. Every social work graduate completes extensive fieldwork (at least 400 hours for BSWs and 900 hours for MSWs) under the supervision of experienced professionals. These direct practice experiences are the best assessment of a social worker's skills, not a standardized test that has been proven to be biased.

Additionally, the financial burden of the ASWB exams disproportionately impacts those who are already economically disadvantaged. The \$230-260 exam fee, plus the costs of retaking the test, adds another layer of inequity. Many students—especially first-generation college graduates and those from historically underrepresented backgrounds—simply cannot afford repeated attempts.

This financial strain, coupled with the stress of an exam designed for them to fail, discourages talented individuals from even entering the field.

Other states have already recognized these inequities and taken action. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all reformed or eliminated licensing exams at the Bachelor's and Master's levels. There is no evidence that removing the exam has harmed public safety—only that it has expanded the pipeline for a more diverse, competent social work workforce.

Despite these clear inequities, BSWE has consistently aligned itself with ASWB's financial interests rather than prioritizing Marylanders' need for accessible, culturally responsive mental health care. SB379 takes a crucial step in addressing this by adding consumer members to the board, ensuring greater accountability and oversight.

As a social work student, I want my future colleagues to reflect the diversity of Maryland's communities. But right now, the numbers show that this is not happening. According to Maryland's own Behavioral Health Workforce Assessment, MSW graduation rates are declining, and **70% of social work graduates will not be serving Marylanders in a social work capacity within one year of graduation.** The licensing exam is one of the many systemic barriers preventing us from building the workforce Maryland desperately needs.

Maryland has long been a leader in advancing equity. Now, we have an opportunity to modernize our social work licensing process to ensure that qualified, passionate professionals—especially those from marginalized communities—can enter the field without being blocked by a biased, outdated exam. Please support SB379 and help create a more just, diverse, and effective social work workforce for Maryland.

**Sincerely,**

Aaraa Brown, B.Ed.

Class of 2025

**Maryland Congressional District 4**

**Maryland Legislative District 24**

# Alex Wang - SB379 Testimony - FAV.pdf

Uploaded by: Alex Wang

Position: FAV



Dear Members of the Senate Finance Committee,

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence, but are inherent in the design of standardized testing, which has consistent bias against already marginalized groups.

In response to the data release, Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October, 2023. They have been meeting monthly and heard from a diverse array of perspectives, including two presentations by ASWB, a nursing exam expert, and the Director of NASW-Illinois, who reviewed the effects of licensure reform efforts in that state. The workgroup determined that removing the exam at the Bachelors (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.

We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

Repeating a statement over and over again does not make it true. ASWB has had 40 years to provide proof that their exams are correlated with safe and effective social work practice, and it has not done so. ASWB only released pass rate data under incredible pressure, as it proved what social workers have colloquially known for years. Much as ASWB would like to convince you otherwise, there simply is no true way to objectively measure social work competence. Social work is a highly person-centered profession, people are not standardized, and impossible-to-measure skills such as empathy are of ultimate importance to the field of social work. Research indicates that standardized tests are often culturally biased, relying on knowledge and reasoning shaped by dominant cultural norms. Differing knowledge and ways of thinking are a core strength of social work, but our licensing exams treat them as liabilities to be weeded out.

Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

In addition to not providing any type of measurement of social work skill, ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already

marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels. There is no evidence that lack of exams or exam removal have brought harm to the public. Because Illinois has some of the most easily accessible data and a slightly longer period of Masters level exam removal, they were studied in more detail in the Workgroup [final report](#) (page 36-37). Exam removal has had zero effect on the number of sanctions in that state.

Our BSWE is a member of the ASWB. It was one of few organizations afforded two seats on the Social Work Licensing Workgroup. Unfortunately, BSWE's allegiances are unclear and potentially problematic for a Maryland-based board. They consistently sided with ASWB's financial interests rather than centering the interests of Marylanders who are in desperate need of culturally responsive social work services. I applaud this legislation for increasing oversight by adding consumer members.

As a social work student, it is important to me that my future workforce reflects the diversity of the communities that we serve in Maryland and the diversity of students that are a part of my social work program. Maryland's own [Behavioral Health Workforce Assessment](#) shows that MSW graduation rates are declining and that 70% of my cohort will not be serving Marylanders in a social work capacity within one year of graduation. While this is not fully explained by ASWB exams, it is at least partially explained by it. This number also reflects my BIPOC, older, multilingual, and deaf colleagues who will avoid jobs that require licensure because they do not want to take exams that are stacked against them. Removing an exam that stops careers before they even begin can make social work a more attractive profession, increasing enrollment in MSW programs.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,  
Alex Wang  
University of Maryland Baltimore, School of Social Work  
Class of 2025  
District 43A

# **Dear Members of the Senate Finance Committee.pdf**

Uploaded by: Andre' Thompson

Position: FAV

Dear Members of the Senate Finance Committee,

I request that you codify workgroup recommendations and **find a favorable report for SB379**. By adding two more consumer members, this bill will increase accountability to the Board of Social Work Examiners (BSWE) and create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence but are inherent in the design of standardized testing, which has a consistent bias against already marginalized groups.

In response to the data release, the Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October 2023. They have been meeting monthly and heard from diverse perspectives, including two presentations by ASWB, a nursing exam expert, and the Director of NASW-Illinois, who reviewed the effects of licensure reform efforts in that state. The workgroup determined that removing the exam at the Bachelor (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.

We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier with the ultimate veto power in their ability to work - a demonstrably biased exam. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they could practice! LBSWs and LMSWs are usually the ones doing the essential but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and improves outcomes for clients from racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

Repeating a statement over and over again does not make it accurate. ASWB has had 40 years to provide proof that its exams are correlated with safe and effective social work practice, and it has not done so. ASWB only released pass rate data under incredible pressure, proving what social workers have colloquially known for years. Much as ASWB would like to convince you otherwise, there is no accurate way to measure social work

competence objectively. Social work is highly person-centered; people are not standardized, and impossible-to-measure skills such as empathy are paramount to social work. Research indicates that standardized tests are often culturally biased, relying on knowledge and reasoning shaped by dominant cultural norms. Differing knowledge and ways of thinking are a core strength of social work, but our licensing exams treat them as liabilities to be weeded out.

Every new BSW graduate has at least 400 hours of supervised practice, and every MSW graduate has at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

In addition to not providing any measurement of social work skills, ASWB exams are a substantial financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a more challenging time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist. I am a 60-year-old African American male who has taken the exam 4 times, failing by less than 5 points each time. My last attempt was 10/28/2024. I needed a 98 but received a 96. I have spent thousands of dollars on the exam, application fees, boot camps, and individual tutors. I have been working in the field of social since 2021. My job reduced my pay because I did not pass, but it did not reduce my responsibilities. I am getting paid as a Counselor II with my Social Work Care Manager title. Now, the state is not renewing my program grant, and because of the exam, I am reduced to taking a less-paying position because I do not have LMSW behind my name. I am now in the process of filing for bankruptcy.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the bachelor and master license levels. There is no evidence that the lack of exams or exam removal has harmed the public. Because Illinois has some of the most easily accessible data and a slightly more extended period of Masters level exam removal, they were studied in more detail in the Workgroup [final report](#) (page 36-37). Exam removal has had zero effect on the number of sanctions in that state.

Our BSWE is a member of the ASWB. It was one of few organizations afforded two seats on the Social Work Licensing Workgroup. Unfortunately, BSWE's allegiances are unclear and potentially problematic for a Maryland-based board. They consistently sided with ASWB's financial interests rather than centering the

interests of Marylanders who desperately need culturally responsive social work services. I applaud this legislation for increasing oversight by adding consumer members.

Maryland has long emphasized equity in various other programs, and the field of social work should be no different. We have an incredible opportunity to remove outdated, biased licensing models and modernize our state's social work licensing process to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,

Andre' T. Thompson, MSW, CSC-AD, RPS

District 7, Legislative Area 43A

# **Exam Testimony.pdf**

Uploaded by: Bee Page

Position: FAV

**Dear Members of the Senate Finance Committee,**

I am writing to ask that you please support SB379 and help bring meaningful change to Maryland's social work licensing process. This bill is a step toward a more equitable and compassionate system, one that acknowledges the struggles faced by too many qualified social workers who are unjustly barred from practicing due to a biased and outdated exam system.

The data shared by the Association of Social Work Boards (ASWB) in 2022 paints a troubling picture—one that is hard to ignore. Social work licensing exams show a deep racial and age-based disparity. White candidates pass at rates of 84%, while Black candidates pass at just 45%, and Hispanic candidates at 64%. These numbers are not a reflection of competence, but of systemic barriers that have no place in today's society. These disparities are not just statistics—they represent real people who are being denied the opportunity to serve their communities because of a biased test that does not measure the qualities essential to being an effective social worker.

The recent 2023 workgroup on social work licensing, formed by the Maryland legislature, found that eliminating the exam requirement at both the Bachelor's (LBSW) and Master's (LMSW) levels is the right way forward for our state. For many social workers, particularly from marginalized communities, this exam is an impossible barrier—one that stands between them and their communities. If all demographic groups passed at the same rate as white candidates, Maryland would have 1,227 more licensed social workers. Imagine the profound impact those 1,227 social workers could have, especially in underserved areas where help is needed most.

Social workers in Maryland, especially those at the LBSW and LMSW levels, are the ones providing critical care in hospitals, mental health centers, foster care systems, and beyond. They are the unsung heroes of our social services. Yet, their potential is stifled by an exam that does nothing to measure their real-world skills or their ability to connect with those in need. The diverse social workers we need to represent our communities cannot be reduced to a score on an arbitrary test. Clients, especially from BIPOC and other underserved groups, deserve to see social workers who reflect their lived experiences, because we know that a more diverse workforce improves outcomes and promotes cultural humility.

Moreover, the financial burden of these exams is another profound injustice. For many, especially those from marginalized backgrounds, the costs of retaking the exam multiple times can be devastating—further delaying their ability to serve their communities and perpetuating existing inequalities. No one should be forced to choose between their career and financial security, but this exam system leaves too many people with that impossible decision.

I stand alongside many other states that have already removed or reduced the role of these harmful exams. Colorado, Illinois, Minnesota, and others have proven that it is possible to remove this barrier without jeopardizing public safety or the quality of social work services. In fact, Illinois, which has the longest experience with exam removal, has seen zero increase in sanctions against social workers. Removing the exam does not endanger the public—it enhances our workforce, making it more diverse, compassionate, and better equipped to meet the needs of every Marylander.



In this fight, we must not forget that this issue is not just about policies or procedures. It's about real people—social workers who are passionate, dedicated, and ready to make a difference. They deserve a fair chance to do so. I ask that you consider the weight of their voices, the lives they can change, and the communities they can heal. Please, pass SB379 and give Maryland's social workers the tools they need to do the work we so desperately need them to do.

Thank you for your time and for your consideration of this important legislation.

Sincerely,  
August Page, MSW Candidate  
District 43A

# **Testimony of Bryan Victor in Support of SB0379.pdf**

Uploaded by: Bryan Victor

Position: FAV

**Testimony of Bryan Victor, MSW, Ph.D.**  
**February 4, 2025**  
**Maryland Senate Finance Committee**

**In Support of Senate Bill 0379**

Good Afternoon Chair Beidle, Vice Chair Hayes, and distinguished members of the Senate Finance Committee,

My name is Bryan Victor and I am an associate professor in the School of Social Work at Wayne State University. My research focuses in large part on social work licensure so I appreciate the opportunity to be with you today and offer testimony in support of SB0379.

The Association of Social Work Boards (ASWB) often frames its exams as a blood pressure cuff or a thermometer that simply offers a quick reading of a test taker's competency.

Sticking with that framing, I'd strongly encourage you to issue a statewide recall for a faulty device. And let me explain why.

For decades research has indicated that the ASWB exams have serious flaws that render them an invalid measure of social workers' readiness to practice.<sup>1</sup>

Additionally, to date, not a single peer-reviewed study has demonstrated that the exam can differentiate between qualified and unqualified social workers. That is, there is no evidence that the exams perform the exact function that Maryland is counting on the exams to perform in the licensure process.

In 2021, ASWB itself hired a researcher at Rutgers University to find evidence to support the use of its exams in the social work licensure process. When the researcher from Rutgers informed the organization there is no evidence that the exams work as advertised, ASWB characterized her

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<sup>1</sup> Albright, D. L., & Thyer, B. A. (2010). A test of the validity of the LCSW examination: Quis custodiet ipsos custodes?. *Social Work Research*, 34(4), 229-234.

Victor, B. G., McNally, K., Qi, Z., & Perron, B. E. (2024). Construct-irrelevant variance on the ASWB Clinical Social Work Licensing Exam: A replication of prior validity concerns. *Research on Social Work Practice*, 34(2), 217-221. <https://doi.org/10.1177/10497315231188305>

Victor, B. G., Kubiak, S., Angell, B., & Perron, B. E. (2023). Time to Move Beyond the ASWB Licensing Exams: Can Generative Artificial Intelligence Offer a Way Forward for Social Work? *Research on Social Work Practice*, 33(5), 511-517. <https://doi.org/10.1177/10497315231166125>

findings as “bleak”.<sup>2</sup>

Another reason to discontinue use of the ASWB exams is that the Association of Social Work Boards does not follow their own industry standards for product development. Experts note that the ASWB is not in compliance with The Standards for Educational and Psychological Testing which guide the responsible development of exams like those produced and sold by the ASWB.<sup>3</sup>

Again, I urge you to issue a statewide recall on these defective ASWB products that artificially deplete Maryland’s behavioral health workforce in order to enrich an out-of-state, third-party vendor.

Thank you, and I encourage you to vote in support of the bill.

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<sup>2</sup> <https://www.aswb.org/researchers-bring-much-more-than-a-lit-review/>

<sup>3</sup> The leading scholar on noncompliance is Matthew DeCarlo, MSW, Ph.D. at St. Joseph’s University in Philadelphia. Standards with which the ASWB does not appear to comply include but are not limited to: Standard 2.14; Standard 2.15. and Standard 2.4. Noncompliance largely stems from either not completing required psychometric testing and/or not making data available for independent audit.

**Rivera\_Testimony\_SB0379.pdf**

Uploaded by: Carmen Rivera

Position: FAV

Dear Members of the Senate Finance Committee,

My name is Carmen Rivera and I am a resident of Prince George's County, Maryland. I have been a social worker for nearly ten years and have practiced social work in Maryland for the past four.

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence, but are inherent in the design of standardized testing, which has consistent bias against already marginalized groups.

In response to the data release, Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October, 2023. They have been meeting monthly and heard from a diverse array of perspectives, including two presentations by ASWB, a nursing exam expert, and the Director of NASW-Illinois, who reviewed the effects of licensure reform efforts in that state. The workgroup determined that removing the exam at the Bachelors (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.

We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

Repeating a statement over and over again does not make it true. ASWB has had 40 years to provide proof that their exams are correlated with safe and effective social work practice, and it has not done so. ASWB only released pass rate data under incredible pressure, as it proved what social workers have colloquially known for years. Much as ASWB would like to convince you otherwise, there simply is no true way to objectively measure social work competence. Social work is a highly person-centered profession, people are not standardized, and impossible-to-measure skills such as empathy are of ultimate importance to the field of social work. Research indicates that standardized tests are often culturally biased, relying on knowledge and reasoning shaped by dominant cultural norms. Differing knowledge and ways of thinking are a core strength of social work, but our licensing exams treat them as liabilities to be weeded out.

Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

In addition to not providing any type of measurement of social work skill, ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist.

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Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,  
Carmen Rivera, MSW, LCSW-C  
Resident of Maryland Legislative District 47A

**SB379 Brocht testimony.pdf**

Uploaded by: Chauna Brocht

Position: FAV



Dear Members of the Senate Finance Committee,

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

As a social work manager for over 15 years, I know firsthand the challenges in hiring caused by the inequities in the social work exams. Over the course of my career, I've known many very talented social workers who struggled to pass the ASWB. In my experience, there is no correlation between passing the exam and providing excellent social work services. Some of my colleagues who have taken the exam over 10 times before passing are now leaders in the social work field.

As you might know, since the pandemic, hiring has become even more difficult. I work with several programs that are struggling to hire social workers and cannot fulfill critical services as a result. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

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Sincerely,  
Chauna Brocht, LCSW-C  
2509 Guilford Ave.  
Baltimore, MD 21218  
District 43A

**SB 379 - SW Licensing - Kastner - FAV.pdf**

Uploaded by: Chloe Kastner

Position: FAV

Dear Members of the Senate Finance Committee,

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In response to the data release, Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October 2023. They have been meeting monthly and heard from a diverse array of perspectives, including two presentations by ASWB, a nursing exam expert, and the Director of NASW-Illinois, who reviewed the effects of licensure reform efforts in that state. The workgroup determined that removing the exam at the Bachelors (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.

We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

Repeating a statement over and over again does not make it true. ASWB has had 40 years to provide proof that their exams are correlated with safe and effective social work practice, and it has not done so. ASWB only released pass rate data under incredible pressure, as it proved what social workers have colloquially known for years. Much as ASWB would like to convince you otherwise, there simply is no true way to objectively measure social work competence. Social work is a highly person-centered profession, people are not standardized, and impossible-to-measure skills such as empathy are of ultimate importance to the field of social work. Research indicates that standardized tests are often culturally biased, relying on knowledge and reasoning shaped by dominant cultural norms. Differing knowledge and ways of thinking are a core strength of social work, but our licensing exams treat them as liabilities to be weeded out.

Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition

of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

In addition to not providing any type of measurement of social work skill, ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels. There is no evidence that lack of exams or exam removal have brought harm to the public. Because Illinois has some of the most easily accessible data and a slightly longer period of Masters level exam removal, they were studied in more detail in the Workgroup [final report](#) (page 36-37). Exam removal has had zero effect on the number of sanctions in that state.

Our BSWE is a member of the ASWB. It was one of few organizations afforded two seats on the Social Work Licensing Workgroup. Unfortunately, BSWE's allegiances are unclear and potentially problematic for a Maryland-based board. They consistently sided with ASWB's financial interests rather than centering the interests of Marylanders who are in desperate need of culturally responsive social work services. I applaud this legislation for increasing oversight by adding consumer members.

As a social work student, it is important to me that my future workforce reflects the diversity of the communities that we serve in Maryland and the diversity of students that are a part of my social work program. Maryland's own [Behavioral Health Workforce Assessment](#) shows that MSW graduation rates are declining and that 70% of my cohort will not be serving Marylanders in a social work capacity within one year of graduation. While this is not fully explained by ASWB exams, it is at least partially explained by it. This number also reflects my BIPOC, older, multilingual, and deaf colleagues who will avoid jobs that require licensure because they do not want to take exams that are stacked against them. Removing an exam that stops careers before they even begin can make social work a more attractive profession, increasing enrollment in MSW programs.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,  
Chloe Kastner  
Class of 2026  
District 34B

# **Pathways to Housing-SB0379 Favorable Testimony-Sen**

Uploaded by: Christy Respress

Position: FAV

January 31, 2025

Re: SB0379 State Board of Social Work Examiners - Membership and Examination Requirements

**Position: Favorable**

Dear Members of the Senate Finance Committee,

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB0379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

Pathways to Housing DC opened in 2004 when we brought the Housing First model to Washington, DC. We were thrilled to expand our services into Montgomery County, MD in 2018 with the receipt of a five-year innovation grant from the Substance Abuse and Mental Health Services Administration that we called "Pathways Home". Using a client-centered approach, our efforts target Montgomery County's residents experiencing homelessness who are living with substance use and/or co-occurring mental health disorders whose service needs are not being met by existing programs. We have since expanded our outreach and housing programs in Montgomery County and added a housing program in Prince George's County.

In 2022, the Association of Social Work Boards (ASWB) released data that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence, but are inherent in the design of standardized testing, which has consistent bias against already marginalized groups.

In response to the data release, Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October, 2023. They have been meeting monthly and heard from a diverse array of perspectives, including two presentations by ASWB, a nursing exam expert, and the Director of NASW-Illinois, who reviewed the effects of licensure reform efforts in that state. The workgroup determined that removing the exam at the Bachelors (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.

We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional 1227 licensed social workers if every demographic group passed at the

same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

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In addition to not providing any type of measurement of social work skill, ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist.

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of culturally responsive social work services. I applaud this legislation for increasing oversight by adding consumer members.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state.

We have directly witnessed staff, who our licensed social workers have assessed as qualified and competent, be harmed by the use of the Association of Social Work Boards' exams. As an employer of social workers, **Pathways to Housing DC is absolutely thrilled to hire qualified social workers who have not passed an ASWB exam.** Being able to hire social workers who have not had to face the discriminatory barrier of the ASWB exams means that we will no longer be complicit in an ableist, ageist, and racist licensing system. We look forward to the passing of this legislation to increase our access to qualified social workers and expand our services in Maryland. For the reasons listed above, Pathways to Housing DC urges the committee to issue a favorable report for Senate Bill 0379.



Christy Respress, MSW, Executive Director



**SB0379\_MHAMD\_FAV.pdf**

Uploaded by: Dan Martin

Position: FAV

**Senate Bill 379 State Board of Social Work Examiners –  
Membership and Examination Requirements**  
Finance Committee  
February 4, 2025  
**Position: SUPPORT**

Mental Health Association of Maryland (MHAMD) is a nonprofit education and advocacy organization that brings together consumers, families, clinicians, advocates and concerned citizens for unified action in all aspects of mental health and substance use disorders (collectively referred to as behavioral health). We appreciate the opportunity to provide this testimony in support of Senate Bill 379.

SB 379 repeals the examination requirements for bachelor and master social worker licenses, which could help increase Maryland's social worker workforce by thousands.

Data from an [alarming new assessment](#) of Maryland's behavioral health workforce highlights an escalating crisis in access to mental health and substance use care. According to the report<sup>1</sup>, which was completed pursuant to legislation the General Assembly passed in 2023 ([SB 283/HB 418](#)), the state's current behavioral health workforce is 50 percent smaller than necessary to meet today's demand and 45 percent of the existing workforce is expected to leave the field by 2028.

The scale of this workforce crisis is particularly striking among Maryland social workers. In 2023, there were an estimated 2,799 social workers employed in behavioral health settings. In order to meet the current demand and replace workers leaving the field, Maryland will need to attract an additional 2,675 social workers by 2028. This will be a tall challenge given recent graduation trends and employment patterns. Since the onset of the Covid-19 pandemic, degree completions from Maryland's social work master's programs have declined nine percent from their 2019 peaks. Further, only a small portion of graduates from behavioral health-related and nursing education programs actually work jobs in Maryland providing behavioral health services to residents. Seventy percent of Masters of Social Work and Clinical and Counseling Psychology graduates from Maryland universities since 2014 are either working in other industries in Maryland, are employed out of state, or not working one year after degree completion.

The General Assembly has taken several important steps in recent years to streamline the delivery of quality behavioral health care and bolster the state's behavioral health workforce, but we are not out of this crisis yet. SB 379 has the potential to increase access to critical behavioral health services by expanding Maryland's social worker workforce by thousands. For this reason, MHAMD supports this bill and urges a favorable report.

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<sup>1</sup> *Investing in Maryland's Behavioral Health Talent*. Maryland Health Care Commission. October 2024.  
[https://mhcc.maryland.gov/mhcc/pages/plr/plr/documents/2024/md\\_bh\\_workforce\\_rpt\\_SB283.pdf](https://mhcc.maryland.gov/mhcc/pages/plr/plr/documents/2024/md_bh_workforce_rpt_SB283.pdf)

*For more information, please contact Dan Martin at (410) 978-8865*

**SB 379\_SW Exam Requirements\_BHSB\_FAVORABLE.pdf**

Uploaded by: Dan Rabbitt

Position: FAV



February 4, 2025

**Senate Finance Committee  
TESTIMONY IN SUPPORT**

*SB 379 – State Board of Social Work Examiners - Membership and Examination Requirements*

Behavioral Health System Baltimore (BHSB) is a nonprofit organization that serves as the local behavioral health authority (LBHA) for Baltimore City. BHSB works to increase access to a full range of quality behavioral health (mental health and substance use) services and advocates for innovative approaches to prevention, early intervention, treatment and recovery for individuals, families, and communities. Baltimore City represents nearly 35 percent of the public behavioral health system in Maryland, serving over 100,000 people with mental illness and substance use disorders (collectively referred to as “behavioral health”) annually.

**Behavioral Health System Baltimore strongly supports SB 379 – State Board of Social Work Examiners - Membership and Examination Requirements.** This bill would implement recommendations from the Maryland Workgroup on Social Worker Requirements for Licensure to eliminate exam requirements for lower-level social work licenses. This would help address shocking racial disparities in social work licensure exam passage and address our state’s behavioral health workforce shortage.

Maryland faces a severe behavioral health workforce shortage. A recent comprehensive analysis found that there were 2,799 social workers employed in behavioral health settings in Maryland and that an additional 2,675 would be needed by 2028 to meet the state’s needs. The report also showed that Black behavioral health professionals are overrepresented in lower-income, unlicensed positions.<sup>1</sup> More must be done to address the shortage overall and to expand opportunities for people of color.

This is even more urgent when considering the dramatic disparities in social work licensure exam passage. The Association of Social Work Boards released data on exam passage rates broken down by race for the first time in 2022 and the data was disturbing. The data showed that only half of Black master’s level applicants ever pass the exam while over 90% of their white counterparts do. At the bachelor’s level, only 38% of Black applicants ever pass the exam compared to 82% of their white counterparts.<sup>2</sup> Thousands of potential social work professionals who were unable to pass the licensure exam have either left the field entirely or work at paraprofessional, unlicensed level despite their education. This represents a terrible inequity that has led to an unrepresentative social work field.

SB 379 represents a commonsense proposal to increase the number of licensed social workers and social workers of color by eliminating the requirement to pass an exam for the LBSW and LMSW licenses. The exam requirement is retained for the LCSW-C license, the most advanced social work license. BHSB supports this effort to help address disparities in Baltimore where white licensed social workers are overrepresented compared to the racial makeup of the city as a whole or the populations generally served.

The state of Illinois passed a similar bill that went into effect in 2022, and the number of social workers licensed at the lower level doubled from about 5,000 to 10,000 professionals in just two years. This expansion was achieved without any increase in sanctions or complaints regarding licensed social workers in the state. Maryland could achieve a similar expansion of our social work workforce, addressing our workforce challenges without any cost to the state.

This legislation is a reasonable approach to address the disparities in Maryland’s social work profession and our workforce shortage overall. It is the result of over two years of deliberation from the Maryland Workgroup on Social Worker Requirements for Licensure. **We urge the Senate Finance Committee to accept the Workgroup’s recommendations and support SB 379 to address inequity in the social work field.**

*For more information, please contact BHSB Policy Director Dan Rabbitt at 443-401-6142*

**Endnotes:**

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<sup>1</sup> Maryland Health Care Commission. Investing in Maryland’s Behavioral Health Talent. October 2024. [https://mhcc.maryland.gov/mhcc/pages/plr/plr/documents/2024/md\\_bh\\_workforce\\_rpt\\_SB283.pdf](https://mhcc.maryland.gov/mhcc/pages/plr/plr/documents/2024/md_bh_workforce_rpt_SB283.pdf)

<sup>2</sup> 2022 ASWB Exam Pass Rate Analysis. Available at <https://health.maryland.gov/workgroup-swrl/Documents/2022%20ASWB%20Pass%20Rates%20and%20Analysis.pdf>

# **SW Testimony MD.pdf**

Uploaded by: Dasia Adams

Position: FAV

Dear Members of the Senate Finance Committee,

I am writing to offer my full support for Senate Bill 379, which seeks to repeal the examination requirements for bachelor and master social worker licenses in the state of Maryland. As a licensed social worker in Washington, D.C., I have personally experienced the challenges that come with these examination requirements, and I am deeply motivated to advocate for a change that will benefit both future social workers and the communities we serve.

In my own journey, I faced significant obstacles when attempting to pass the master's level social work exam. Despite my extensive academic background, my passion for helping others, and my years of practical experience, I found myself struggling to pass this exam. I failed the test twice before finally passing it on my third attempt. This prolonged process affected not only my career progression but also my confidence, self-esteem, and mental health. The weight of failure was not just about the inability to move forward in my professional career—it deeply impacted how I viewed myself as a social worker, despite my clear commitment to the field.

The examination process, in my view, does not truly assess the core qualities that make an effective social worker. Social work is not about rote memorization of facts and figures. It is about empathy, critical thinking, cultural competence, and the ability to build relationships with individuals and communities to drive social change. The current licensure examination requirements do not measure these essential skills. Instead, they focus on an artificial standard that stifles the growth and development of those eager to contribute positively to society.

Furthermore, failing to pass the exam as a barrier to entering the social work field disproportionately impacts individuals from diverse and underrepresented backgrounds who may not have the privilege of additional test preparation resources or who experience test anxiety. This is a systemic issue that holds back those who could be making powerful, positive changes in our communities.

I believe it is crucial to prioritize real-world experience, compassion, and the capacity to make meaningful change in the lives of others over an arbitrary examination standard. Social workers who are equipped with the right tools, knowledge, and commitment to the profession should not be hindered by the exam process.

After my experience of passing the exam on the third attempt, I was motivated to become a strong advocate for future social workers. I am determined to ensure that the next

generation does not face the same unnecessary barriers I did, and that they have the opportunity to thrive and contribute to societal progress from the very beginning of their careers.

I urge the Maryland Senate Finance Committee to pass Senate Bill 379. Let us not allow an exam to stunt the growth of our future social workers or prevent them from making a profound impact on society. It's time to embrace a more holistic approach to licensure that better reflects the true essence of the social work profession.

Thank you for your consideration.

Sincerely,

Dasia Adams (LGSW)

(Maryland District 6 Resident)



**SB0379 UMSSW Shafer, Lehning, Bailey.pdf**

Uploaded by: Dawn Shafer

Position: FAV

Favorable testimony for SB0379

Submitted on behalf of the University of Maryland School of Social Work by:

Dawn Shafer, PhD, LCSW-C  
Amanda Lehning, PhD, MSW  
Temeka Bailey, PhD, LCSW-C

Dear Members of the Senate Finance Committee,

We are writing to share our support for SB0379. As Associate Deans and Directors at the University of Maryland School of Social Work, we are invested in ensuring an equitable path to licensure for our MSW graduates. The exam pass rates released by the Association of Social Work Boards in 2022 clearly indicate significant disparities based on social identities, something that is deeply troubling in a field that seeks to further social justice and equity within our society.

As mandated by SB0871 in April 2023, the Maryland Workgroup on Social Worker Requirements for Licensure has comprehensively examined this issue and provided the recommendation that Maryland remove the ASWB exam requirement for bachelor and master social work licenses. We strongly agree with this recommendation.

There is no evidence that the ASWB exams effectively measure competence, nor has it been established that passing the exam protects the safety of the public. Rather, the exam has been used to exclude competent social workers from historically marginalized identities, contributing to the social worker shortage in Maryland. This shortage is particularly marked within Communities of Color where cultural connection and cultural humility contribute to greater outcomes for clients. Creating a pathway that allows these dedicated professionals to practice will benefit the citizens of Maryland and the social work profession.

Social workers who fail the exam experience significant financial penalties in the form of additional testing fees, delayed and lost job opportunities, and lower salaries. The University of Maryland School of Social Work educates the majority of social workers in Maryland and has a diverse student population. All our students engage in rigorous coursework and must complete the program with a 3.0 grade point average or better; most students have a significantly higher GPA. They engage in field practicum experiences which provide in-depth training under the supervision of experienced social workers. Our program is accredited by the Council on Social Work Education (CSWE) which requires us to regularly assess our students' achievement in core social work practice competencies. Our MSW students all receive the same educational opportunities at our school, yet the difference in pass rates for students who are Black, Brown, older, or whose first language is not English is marked – this is true in MSW

programs across the state and across the country. If students receive the same education, yet students pass at substantially lower rates correlated with their social identities, there are few options to explain the disparity. Either we can accept that the exam has cultural bias and benefits those from majority identities, or we can accept the alternative, which is that Black students (and others who fail at disproportionate rates) are less competent practitioners. We hope that we can all agree that the latter is preposterous and can commit to fixing the inherent issues with the exam, or creating another, equitable, pathway to licensure.

Again, we support SB0379 as written. We are committed to working together to ensure that all social workers can practice the profession that they have chosen and worked tirelessly to gain the necessary education and experience. Thank you for your consideration.

Dawn Shafer, PhD, LCSW-C  
Associate Dean, Student Affairs

Amanda Lehning, PhD, MSW  
Senior Associate Dean, Academic Affairs

Temeka Bailey, PhD, LCSW-C  
Director, SWCOS Student Education

# **SB379 State Board of Social Work Examiners – Membe**

Uploaded by: Dean Judy Postmus

Position: FAV

**Testimony in Support of SB 379**  
**State Board of Social Work Examiners – Membership and Examination**

Thank you, Chairman Senator Beidle, Vice Chair Senator Hayes, and members of the Finance Committee for addressing this important issue and recognizing the vital role of social workers in Maryland. As dean of the University of Maryland, School of Social Work, I appreciate the opportunity to express our support for SB 379, which proposes removing the licensing exam requirement for entry-level licensure: *Licensed Bachelor of Social Work (LBSW)* or *Licensed Certified Social Worker (LCSW)*.

In August 2022, the Association of Social Work Boards released data revealing troubling disparities in exam pass rates among racial groups, particularly for Black test takers. Other groups, including older adults and those for whom English is not their primary language, also faced lower pass rates. These disparities were found across the state and country and highlight systemic inequities in the exam. The social work community, including higher education programs, is committed to confronting and dismantling systemic racism within our profession. Removing the exam requirement is a step toward equity.

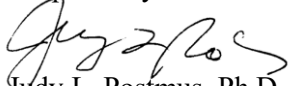
I serve on the *Workgroup on Social Work Licensure Requirements*, established by SB 871 during the 2024 legislative session. Our workgroup examined licensing practices across the country and found that there are 10 states that never had an exam and another 4 states that eliminated or are in process of eliminating the exam requirement. Those states that successfully removed the exam (e.g. Illinois) experienced an increase in the number of licensed social workers entering the field. As you know, Maryland faces a shortage of social workers. Removing this unnecessary barrier will help expand the workforce and ensure that more qualified professionals are available to serve our communities.

SB 379 ensures that the other important licensing requirements remain in place including graduating from a social work program that is accredited by the Council on Social Work Education (CSWE) and undergoing a criminal history records check. Additionally, licensed social workers work under the supervision of experienced social workers. They are also required to complete 40 hours of continuing education every two years.

Social work academic programs are rigorous, requiring extensive coursework, field practicums, and evaluations. These experiences equip graduates with the skills and knowledge to provide high-quality and ethical services. SB 379 reflects a commitment to creating an equitable and inclusive licensing process while protecting public safety. By eliminating the exam requirement, we can break down unnecessary barriers and strengthen Maryland's social work workforce.

We urge the Committee to support this essential reform. Thank you for your consideration of SB 379.

Respectfully submitted by



Judy L. Postmus, Ph.D., ACSW, Dean & Professor

Cc: Senators M. Washington, Benson, Lam, and Brooks

# Written Testimony.pdf

Uploaded by: Eleshia Thomas

Position: FAV

Dear Members of the Senate Finance Committee,

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence, but are inherent in the design of standardized testing, which has consistent bias against already marginalized groups.

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We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

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Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,

Eleshia B. Thomas, MSW, CPRP, ADT  
Baltimore County (Catonsville)







**SB379 testimony Ellen Line ROAR Healing Co. .pdf**

Uploaded by: Ellen Line

Position: FAV

Dear Members of the Senate Finance Committee,

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence, but are inherent in the design of standardized testing, which has consistent bias against already marginalized groups.

In response to the data release, Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October, 2023. They have been meeting monthly and heard from a diverse array of perspectives, including two presentations by ASWB, a nursing exam expert, and the Director of NASW-Illinois, who reviewed the effects of licensure reform efforts in that state. The workgroup determined that removing the exam at the Bachelors (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.

Social justice is a core value of the social work profession. There is no place in our profession for an exam that is this biased. I studied to become a social worker in Texas, and one of the reasons I moved to Maryland was to live in a state that more closely matches the values of my profession and my personal values. I know that there are many good folks in Maryland who are working toward fairness and equity in our communities across the state. A favorable report for SB379 is one small step you can take to make Maryland more just.

We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

Repeating a statement over and over again does not make it true. ASWB has had 40 years to provide proof that their exams are correlated with safe and effective social work practice, and it has not done so. ASWB only released pass rate data under incredible pressure, as it proved what social workers have colloquially known for years. As much as ASWB would like to convince you otherwise, there simply is no true way to objectively measure social work competence. Social work is a highly person-centered profession, people are not standardized, and impossible-to-measure skills such as empathy are of ultimate importance to the field of social work. Research indicates that standardized tests are often culturally biased, relying on knowledge and reasoning shaped by dominant cultural norms. Differing

knowledge and ways of thinking are a core strength of social work, but our licensing exams treat them as liabilities to be weeded out.

Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

In addition to not providing any type of measurement of social work skill, ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels. There is no evidence that lack of exams or exam removal have brought harm to the public. Because Illinois has some of the most easily accessible data and a slightly longer period of Masters level exam removal, they were studied in more detail in the Workgroup [final report](#) (page 36-37). Exam removal has had zero effect on the number of sanctions in that state.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,  
Ellen Line, LCSW-C  
Constituent, MD District 40

# **Testimony for Bill SB0379.pdf**

Uploaded by: Ellen Schaefer-Salins

Position: FAV

January 31, 2025

Testimony to the Maryland General Assembly for Bill SB379

Dear Maryland General Assembly,

My name is Dr. Ellen Schaefer-Salins and I am an Associate Social Work Professor from Salisbury University. I am also a mental health therapist who has worked in Maryland, and the Washington, DC area for 40 years, providing mental health therapy to deaf and hard of hearing individuals. In the past I have worked at many agencies that serve deaf and hard of hearing clients, and I was an adjunct professor at Gallaudet University.

I am testifying about the ASWB Social Work Licensing exam due to my years of work in the deaf community working with skilled deaf and hard of hearing professionals with social work degrees. Many of these professionals have had difficulty passing the social work licensing exam and would take the exam 5 to 10 times before passing. Or many would not take the exam at all due to fear, or give up on passing the exam after many failed attempts. For many years, I was a consultant at an agency working with clients who were deaf and chronically mentally ill, signing off on paperwork because I am a licensed clinical social worker. Many employees with social work degrees and years of experience at the agency were not licensed and could not sign off on the work that they completed.

After years of seeing this pain and discrimination toward my friends and co-workers, I developed a course at Gallaudet University, to teach people how to pass the ASWB Social Work Licensure Exam. I also tutored several deaf individuals through the years on how to pass the exam. The Gallaudet University course and my tutoring focused some on the content of the test looking at social work practice skills, ethics, and more. But the bulk of the class was teaching people how to understand the questions and how to pick the correct answer. We focused on learning social work vocabulary and how to decipher the questions and understand the nuances of English. I was teaching more about English than social work skills!

The people in the course already had the social work skills and knowledge. But many did not have the test taking skills or an understanding of questions with complicated English. The test should be testing for social work skills. Seeing these very intelligent and skilled people failing the test was sad and infuriating. This course was first offered in 2004, more than 20 years ago. So we have

known the “hearing and ableist” bias of the test for a very long time. I worked with a team of professors from Gallaudet University talking to people at ASWB about these issues. After many discussions, nothing changed with the way the questions are written on the test.

When the statistics on the pass rates were released by ASWB, I was disappointed that there were no statistics on people who are deaf or have a variety of disabilities. Many people who are deaf, people who have learning disabilities, or people who know English as a second language, request extended time to take the exam. Their reason for extended time must be approved by ASWB. This means that an individual will have 6 hours to take the exam instead of 4 which gives a test taker more time to review the questions. It would be easy to show the pass rates of anyone asking for extended time, but these statistics were not shown.

As you hear testimony about how the ASWB Social Work Licensure Exam is racially biased, please also consider how it is biased toward the deaf community and the disability community and how they have been trying to address this for many years without any changes in the exam. The exam must be changed to become fair to all and to test for social work skills and knowledge!

I am asking that you codify the workgroup recommendations on the ASWB exam and vote YES for SB0379. This bill will create a more equitable path toward licensure for all and especially for people in the deaf and disability communities.

Thank you for your time reading this testimony.

Sincerely,

*Ellen Schaefer-Salins, Ph.D., LCSW-C*

Ellen Schaefer-Salins, Ph.D., LCSW-C  
Associate Professor – School of Social Work  
Advisor Deaf Studies Minor and Disability Studies Minor  
Conway Hall (TETC) 254G  
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**testimony SB379.pdf**

Uploaded by: Gretchen Tome

Position: FAV

Dear Members of the Senate Finance Committee,

I am writing as a licensed Social Worker in Maryland (LCSW-C), and as someone with previous experience as a Field Instructor to MSW students and as a board-approved Clinical Supervisor to LCSW-C candidates. I have over 20 years of experience as a Social Worker in Baltimore and am writing to request that you codify the workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence, but are inherent in the design of standardized testing, which has consistent bias against already marginalized groups.

In response to the data release, Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October, 2023. They have been meeting monthly and heard from a diverse array of perspectives, including two presentations by ASWB, a nursing exam expert, and the Director of NASW-Illinois, who reviewed the effects of licensure reform efforts in that state. The workgroup determined that removing the exam at the Bachelors (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.

We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems. Having served as a Field Instructor

for MSW-level students and a Board-approved supervisor for LCSW-C candidates, I can speak to this directly.

ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist. For instance, one such LCSW-C candidate I supervised has several years of direct service experience and has taken - and paid for - the exam five times now, only to miss passing it by less than 10 points each time. Not only are the exam costs adding up, the years of not earning raises directly tied to having an LCSW-C are also creating financial barriers and contributing to wealth disparities.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels. There is no evidence that lack of exams or exam removal have brought harm to the public. Because Illinois has some of the most easily accessible data and a slightly longer period of Masters level exam removal, they were studied in more detail in the Workgroup [final report](#) (page 36-37). Exam removal has had zero effect on the number of sanctions in that state.

Our BSWE is a member of the ASWB. It was one of few organizations afforded two seats on the Social Work Licensing Workgroup. Unfortunately, BSWE's allegiances are unclear and potentially problematic for a Maryland-based board. They consistently sided with ASWB's financial interests rather than centering the interests of Marylanders who are in desperate need of culturally responsive social work services. I applaud this legislation for increasing oversight by adding consumer members.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. You have the opportunity to help Maryland join the many other states that are leading the way in making our field more equitable and diverse. As a long time Social Worker, I urge you to take action to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,  
Gretchen M. Tome, LCSW-C  
Baltimore, MD 21213  
Resident of District 45

**JS testimony submitted to Finance 1-31-25.pdf**

Uploaded by: Jessica Strauss

Position: FAV

January 31, 2025

**To:** Members of the Finance Committee

**Re:** SB379 - State Board of Social Work Examiners – Membership and Examination Requirements

**Position:** FOR – Vote to support the findings of your mandated working group!

Regarding the undeniable and blatant discrimination of the ASWB licensing exams, and the detrimental effect such discrimination has on the mental well-being and health of our communities, you will be hearing a lot of data, analysis and opinions. First-time pass rates, ultimate pass rates, obstacles to success, norming procedures, etc. etc.

Here is what jumps out at me, as an experienced, licensed clinical social worker serving Baltimore City, as the most important statistic you need to focus on:

**Nearly 50% of all Black Masters of Social Work, legitimately graduated from a nationally accredited social work program, will never practice as a licensed social worker.**

These numbers are only slightly better in other groups of color.

***Please place that fact in the context of a dire shortage of mental health providers, especially in marginalized communities of color.***

We simply cannot afford to lose these dedicated, talented and caring professionals based on a standardized test that is widely understood to be normed to middle class white patterns of practice.

Wait!, you might reasonably ask, are you saying that we should send *less qualified* social workers to work in communities of color? As the guardians of the public interest, the State clearly has the responsibility to protect prospective clients and ensure that they will be served by qualified, ethical and safe practitioners. Doesn't the BSWE need the exam in order to do that job?

Of course, no one is suggesting communities of color should be served by less qualified clinicians – quite the contrary. Here are three important pieces of information that address this question.

1. There is extensive research from all over the country indicating that *the test does not correlate at all to quality or safety of practice.*
2. There are skills and qualities, inherent to cultural competence, that arise from identity and lived experience. In many cases, these make social workers *better qualified* to provide appropriate care.
3. These newly minted social workers are never operating without close **supervision**, and cannot be for several years. Board-approved supervisors are bound to provide for the safe practice and quality of their supervisees.

Opponents want you to believe that you should leave standardized testing in place because it is “objective” and because “other professions use it.” Please understand: clinical social work is not like architecture, engineering, accounting, medicine, etc.: human emotions and behavior do not move in predictable or standardized ways, like cells or structures, chemicals or numbers. ***Our profession demands nuanced and sensitive responses to unique individuals, situations, communities and cultures, using not only theory and data, but life experience and cultural wisdom.***

Just as a case in point, Illinois eliminated entry-level exams in mid-2021, even before the discrimination data were released – then licensed 10 times the number of social workers in 2022. There has been no detrimental impact - instead huge benefits to every stakeholder.

As a 69-year-old, white, middle class, clinical social worker, treating chronic and complex trauma, I have learned more than I can say about how best to serve my clients of color from younger and much less experienced graduates and clinicians – because they as people of color, knew best what was needed, saw nuance beneath the obvious, applied deeply felt cultural and ethnic norms, etc. Expertise comes in many forms – and our field needs all kinds. Standardized test-taking is NOT one of them!

Underlying the defense of the exam is an insidious and patently false message. If the defenders claim that the exams are ***reliable measures of competence and safety*** and acknowledge that white test-takers perform nearly twice as well than Black ones with equivalent educational attainment, ***they must conclude that white candidates for licensing are indeed twice as competent and safe as Black candidates*** (with others of color, elders, and other language speakers or otherwise abled candidates ranging between, also less competent than white candidates). ***This conclusion is patently false and abhorrent.***

Much to my surprise, I passed the exam on the first try. But it was not surprising: the exams were normed for me (well, a bit younger since I came to the profession later in life). Even so, in many instances, when questions asked “what should you do if...?” I had to choose a response that failed to consider the conditions many of my clients face and many of the needs they have. Often, my correct response did not align with what I most likely would have actually done. What I offer clients in marginalized Baltimore communities is not the same as what might be offered in Des Moines, Iowa – or even in Towson or Hagerstown. My success did not reflect superior social work skills, experience or judgment: just the ability to guess the mindset of the exam designers.

Although many of us called for the immediate elimination of the Masters level exam two years ago, the MLA chose the more cautious path of establishing a diverse and representative Working Group, including the powerful BSWE which continues to fight for the injustice. You working groups studied the issue in granular detail, looking at research, practice, and the experiences of states that have made this critical change – their conclusion was to recommend elimination of the Master-level exam. **Please support the recommendation of your Working Group and Vote Favorably on SB379.**

Most sincerely,

*Jessica Strauss*

# **Mouny Testimony - SB379.pdf**

Uploaded by: Judith Mouny

Position: FAV

Mounty Testimony SB379  
February 4, 2025

My name is Dr. Judy Mounty. I am a deaf licensed clinical social worker in private practice in Maryland, and a BSWE-approved supervisor. I am testifying in support of SB379, which will remove ASWB examinations as a requirement for the bachelor's and master's level licenses and add two consumer seats to the BSWE.

It is estimated that there are nearly 2 million Marylanders aged 12 years or older who are deaf or hard of hearing. They need social workers who are bilingual in American Sign Language and English and who share their lived experiences.

During 40-plus years of cross-disciplinary experience, I have witnessed the devastating effects of not passing licensing and certification examinations on the careers and lives of deaf and hard of hearing professionals. For many deaf and hard of hearing social work licensure candidates, the linguistic structure of the test items and cultural bias of the examination has impeded access to licensure, employment, ability to serve their population, and advancement in their profession.

I am not aware of ASWB or BSWE collecting data on the licensure status of deaf and hard of hearing social work candidates, but anecdotally, we know that a large percentage are not passing the test. Additionally, some candidates for licensure postpone or never take the test for fear of failing.

For a period of about 15 years, starting around 2000, I had a series of interactions with ASWB leadership. I explained the nature of the problem and asked for their support and assistance in collecting data and addressing the issues. The interest was there, but they expressed concerns about cost given the small size of our community. I have not found that they have made any substantive changes based on my recommendations, and their interest in collaboration waned over the years. As the Deaf social worker representative on the workgroup, I have not found ASWB to be interested in addressing the negative impact of their examinations on my population.

Thank you for your time. I welcome any questions you may have.

Judith L. Mounty, Ed.D., MSW, LCSW-C



**SB379- FAV.pdf**

Uploaded by: Kate Calhoun

Position: FAV

Dear Members of the Senate Finance Committee,

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence, but are inherent in the design of standardized testing, which has consistent bias against already marginalized groups.

In response to the data release, Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October, 2023. They have been meeting monthly and heard from a diverse array of perspectives, including two presentations by ASWB, a nursing exam expert, and the Director of NASW-Illinois, who reviewed the effects of licensure reform efforts in that state. The workgroup determined that removing the exam at the Bachelors (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.

We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

Repeating a statement over and over again does not make it true. ASWB has had 40 years to provide proof that their exams are correlated with safe and effective social work practice, and it has not done so. ASWB only released pass rate data under incredible pressure, as it proved what social workers have colloquially known for years. Much as ASWB would like to convince you otherwise, there simply is no true way to objectively measure social work competence. Social work is a highly person-centered profession, people are not standardized, and impossible-to-measure skills such as empathy are of ultimate importance to the field of social work. Research indicates that standardized tests are often culturally biased, relying on knowledge and reasoning shaped by dominant cultural norms. Differing knowledge and ways of thinking are a core strength of social work, but our licensing exams treat them as liabilities to be weeded out.

Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition

of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

In addition to not providing any type of measurement of social work skill, ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels. There is no evidence that lack of exams or exam removal have brought harm to the public. Because Illinois has some of the most easily accessible data and a slightly longer period of Masters level exam removal, they were studied in more detail in the Workgroup [final report](#) (page 36-37). Exam removal has had zero effect on the number of sanctions in that state.

Our BSWE is a member of the ASWB. It was one of few organizations afforded two seats on the Social Work Licensing Workgroup. Unfortunately, BSWE's allegiances are unclear and potentially problematic for a Maryland-based board. They consistently sided with ASWB's financial interests rather than centering the interests of Marylanders who are in desperate need of culturally responsive social work services. I applaud this legislation for increasing oversight by adding consumer members.

As a social work student, it is important to me that my future workforce reflects the diversity of the communities that we serve in Maryland and the diversity of students that are a part of my social work program. Maryland's own [Behavioral Health Workforce Assessment](#) shows that MSW graduation rates are declining and that 70% of my cohort will not be serving Marylanders in a social work capacity within one year of graduation. While this is not fully explained by ASWB exams, it is at least partially explained by it. This number also reflects my BIPOC, older, multilingual, and deaf colleagues who will avoid jobs that require licensure because they do not want to take exams that are stacked against them. Removing an exam that stops careers before they even begin can make social work a more attractive profession, increasing enrollment in MSW programs.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,  
Kate Calhoun  
Class of 2025

\*\*Please also feel free to personalize this as you see fit! Add your story, submit only part of this, etc\*\*

**Testimony SB0379.pdf**

Uploaded by: Keeley Thomas

Position: FAV

As a Program Director of a behavioral health organization that serves over 5,000 individuals in Maryland and partners with over 300 public schools in Maryland, the one topic that repeatedly comes up in meetings around the state is **workforce shortage**. This is nothing new as this was a concern before the pandemic led to significant reduction in behavioral health professionals' capacity to manage the ever growing need in our communities.

Today, I received notice from a very qualified social work graduate, with years of experience and education under her belt, that she did not pass the social work exam so she is unable to obtain licensure. This will delay our organization's ability to initiate services for children with significant behavioral needs that place them at risk for out of school placements.

It is clear, that based on the data from ASWB that there would be an additional 1227 licensed social workers in Maryland, if every demographic group passed at same rate as white social workers.

- A portion of those 1227 social workers would join our child welfare partners and increase their ability to ensure safety for youth.
- A portion of those 1227 social workers would join our public school systems and help prevent and provide immediate response to students.
- A portion of those 1227 social workers would work in public mental health programs and provide much needed suicide screenings and interventions.
- The rest of the 1227 social workers would take on roles in hospitals, detention centers, and therapy practices helping to ensure that our communities have the supports they need to respond to those in crises.

Those 1227 social workers could be out there saving, and improving, the lives of Marylanders. In short, one major barrier to alleviating the significant behavioral health workforce shortage is the discrepancy in the exam.

As a social worker, I am also deeply committed to ensuring our workforce is one that is qualified to carry out the very important and life impacting work they are entrusted to carry out. I agree there needs to be standards in place for licensure.

- A review of the Maryland Social Work Board of Examiners website shows that numerous social workers have had revoked or probationary status on their licenses due to unethical behaviors in practice. They all previously passed the test.
- I have had the privilege to work with many who have struggled to pass the exam the first, second, third or fourth time. They are intelligent, skillful behavioral health professionals who I would entrust to work with my own family.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels.

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I greatly respect our Maryland Social Work Board of Examiners and am proud to be a Maryland Social Worker. I am confident that this board can explore new ways of moving our profession forward in Maryland.

In short, the test does not accurately *measure* ones ability to be a professional social worker. Thank you for accepting my testimony. Please find a favorable report on SB379.

Keeley Thomas, LCSW-C  
Baltimore County, Maryland

# **Kiana Williams Written Testimony-BLWC.pdf**

Uploaded by: Kiana Williams

Position: FAV

Dear Members of the Senate Finance Committee,

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

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We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

Repeating a statement over and over again does not make it true. ASWB has had 40 years to provide proof that their exams are correlated with safe and effective social work practice, and it has not done so. ASWB only released pass rate data under incredible pressure, as it proved what social workers have colloquially known for years. Much as ASWB would like to convince you otherwise, there simply is no true way to objectively measure social work competence. Social work is a highly person-centered profession, people are not standardized, and impossible-to-measure skills such as empathy are of ultimate importance to the field of social work. Research indicates that standardized tests are often culturally biased, relying on knowledge and reasoning shaped by dominant cultural norms. Differing knowledge and ways of thinking are a core strength of social work, but our licensing exams treat them as liabilities to be weeded out.

Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition



of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

In addition to not providing any type of measurement of social work skill, ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels. There is no evidence that lack of exams or exam removal have brought harm to the public. Because Illinois has some of the most easily accessible data and a slightly longer period of Masters level exam removal, they were studied in more detail in the Workgroup [final report](#) (page 36-37). Exam removal has had zero effect on the number of sanctions in that state.

Our BSWE is a member of the ASWB. It was one of few organizations afforded two seats on the Social Work Licensing Workgroup. Unfortunately, BSWE's allegiances are unclear and potentially problematic for a Maryland-based board. They consistently sided with ASWB's financial interests rather than centering the interests of Marylanders who are in desperate need of culturally responsive social work services. I applaud this legislation for increasing oversight by adding consumer members.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,

Kiana Williams, MSW, ADT  
Baltimore City





**MD Addiction Directors Council - SB 379 FAV.pdf**

Uploaded by: Kim Wireman

Position: FAV



**Maryland Addiction Directors Council**

**Senate Finance Committee**

**January 31, 2025**

**Written Testimony in Support of**

**SB 379 (2025)**

**State Board of Social Work Examiners - Membership and Examination Requirements**

Maryland Addictions Directors Council (MADC) represents outpatient and residential SUD and dual recovery treatment across the State of Maryland. Our members provide over 1,800 treatment beds across Maryland and provide treatment on the front lines of the Opioid Epidemic.

MADC strongly supports SB 379 State Board of Social Work Examiners - Membership and Examination Requirements. Behavioral healthcare providers have experienced a significant workforce shortage for the last five years. SB 379 provides a responsible pathway for licensure for non-clinical social workers and will help diversify the social work profession.

Thank you for the opportunity to offer written testimony. Maryland Addictions Directors Council strongly supports SB 379.

Sincerely,

*Kim Wireman*

Kim Wireman  
Board Member, MADC

*(over)*

# **Testimony from Lisa Kays on SB379.pdf**

Uploaded by: Lisa Kays

Position: FAV

## **Written Testimony from Lisa Kays, LICSW, LCSW-C, LCSW regarding SB379:**

Dear Members of the Senate Finance Committee,

I am submitting this testimony as a licensed clinical social worker in the state of Maryland (LCSW-C) since 2013, a registered supervisor in the state of Maryland since 2022, and a consumer of mental health services, particularly for my sons (age 6 and 9) in Maryland, to urge your support of SB379. I have served as an Adjunct Faculty member at Catholic University's National School of Social Services, teaching the MSW course, Diversity in a Multi-cultural Society and provide Continuing Education workshops in ethics and other topics for my colleagues and multiple agencies and organizations.

Thank you for taking the time to hear testimony in relation to SB379. This bill is critically important to me because it seeks to allay the harm being done by the multi-level licensure exam in my profession, which has been demonstrated to pose significant bias across numerous categories.

In regards to the legislation itself, to my knowledge, we are currently the only profession that requires 3 levels of exams and at each level, my colleagues of color, as well as deaf and older colleagues, pay and labor to complete degrees and then are unable to use them because the exam's bias makes it impossible for them to pass.

I have a specific supervisee who has suffered immensely under these exams as she pursued licensure in Maryland, which she finally acquired last year, almost nearly giving up. She is bi-lingual, an immigrant, and serves children, a population in dire need of clinical professionals currently. In terms of clinicians needed skills right now, she is a unicorn. English-speaking children needing therapy currently are waitlisted all over Maryland; I cannot imagine what the waitlists look like for a Spanish-speaking, bilingual therapist. She failed the exam five times, often by one point only, despite her being a very talented, skilled and highly ethical social worker. She endured extraordinary financial hardship as a result, and faced a career setback of over a decade. She wondered numerous times if she should give up and leave the profession, and I don't blame her, nor, quite frankly, did I counsel her otherwise. Given how few points she fails the exam by, it is impossible to not wonder if the exam questions she fails are ones ASWB later finds are biased--but yet does nothing about. She wrote the ASWB to ask for a remedy, and their response was to critique her study skills. She has written to the Maryland Board to ask for the same, and they explain they are stuck due to the Board's dependence on the exam within their rules. This legislation would provide immediate relief to people who were in her situation, before she finally was able to pass the exam

on the sixth try, after spending thousands of dollars, allowing them to achieve licensure and to serve people in our communities who very much need care.

Additionally, I have recently noticed that when I go to look for therapists of a certain modality requiring advanced skills and training, such as IFS or somatic experiencing, both evidence-based treatments providing high levels of symptom relief quite quickly to people, most all of those certified are white. While this isn't solely due to the biased exam, it speaks to a systemic issue within our profession where people of color cannot advance due to these financial, emotional and logistical barriers, and then, even if they do, are left so financially encumbered that they likely can't pay for these higher levels of training. It is highly problematic for a profession that serves so many people of color to be so white and this exam is contributing extensively to that problem. When seeking social work services and therapy, it is important that clients and consumers can find people whose lived experience matches theirs—and this exam is a major roadblock to that for many people of color, people who are deaf, and people who do not speak English as a first language.

I can also say as a licensed social worker who is white and passed all of these exams the first time that the exams are absurd. Absurd. I feel experientially and the data supports that they contribute nothing to "public safety" as the ASWB likes to tout, are extremely cut off from the actual skills, ethics and knowledge social workers need, and are an arbitrary waste of time that contribute nothing to our profession or the safety of those it serves.

It is my experience as a student, supervisee, and now, a supervisor, of social work that the course work and intensive supervision we receive in order to achieve clinical licensure are the factors that truly contribute to ethical and competent practice and provide more than enough guardrails to ensure that practitioners are serving the public well. The exam is nothing but a meaningless obstacle with no bearing on competence.

Additionally, if you look into it, you would find that many programs that help people of color "study" for the exam are literally saying to them a version of, "You just have to learn to think like a white woman" and that is the "skill" being taught openly and often that helps individuals pass. It sounds like I may be making this up, but I assure you, I am not. I have heard it repeatedly. I would ask for you to consider as people testify in opposition whether they make money off of this exam or have some other financial interest in protecting it. I am learning that many supporting the exam make large sums of money off of test prep, while those who are opposing it are offering free or very low-cost test prep to try to help those stymied by the exam to learn how to overcome its racial and other bias, think like a white person, and pass.



I will add that I attended the ASWB “Community Conversations” about the exam and none of the social workers in my focus group, a sampling from across the United States, expressed any appreciation for or validity to the objectives of the exam as related to public safety. None see it as important or think it effectively screens out good or bad social workers, in any way. The consensus was that it assesses the capacity to take a standardized test—which has nothing to do with actual social work practice or skill.

We know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

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Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work’s rich tradition of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

In addition to not providing any type of measurement of social work skill, ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels. There is no evidence that lack of exams or exam removal have brought harm to the public. Because Illinois has some of the most easily accessible data and a slightly longer period of Masters level exam removal, they were studied in more detail in the Workgroup [final report](#) (page 36-37). Exam removal has had zero effect on the number of sanctions in that state.

Our BSWE is a member of the ASWB. It was one of few organizations afforded two seats on the Social Work Licensing Workgroup. Unfortunately, BSWE's allegiances are unclear and potentially problematic for a Maryland-based board. They consistently sided with ASWB's financial interests rather than centering the interests of Marylanders who are in desperate need of culturally responsive social work services. I applaud this legislation for increasing oversight by adding consumer members.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,  
Lisa Kays, LCSW-C  
7008 Braeburn Court  
Bethesda, MD 20817  
202-489-6882  
[lisa@lisakays.com](mailto:lisa@lisakays.com)

# **Testimony for SB379.pdf**

Uploaded by: Lynda Davis

Position: FAV

Dear Members of the Senate Finance Committee,

I am a Licensed Certified Social Worker-Clinical (LCSW-C). I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence, but are inherent in the design of standardized testing, which has consistent bias against already marginalized groups.

I have a story that illustrates this disparity. I am white. I passed my licensing exams on the first go-round. I believe it was systemic racism and white supremacy that privileged me in regard to the exam and that this does not make me a better, more competent social worker. A former coworker of mine who is Black did not pass her exam the first time and had to take it again. However, she was and still is a much more competent and skilled Social Worker than I am. The test did not accurately measure competence. The fact that my former coworker failed the first time was devastating to her and the clients she serves. If she had not been allowed to enter the field, due to a biased test, her clients, and the Social Workers she supervises, would not have received the benefit of her exceptional social work skills and empathy. This would have been a huge loss for the Social Work field as a whole.

In response to the data release, Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October, 2023. They have been meeting monthly and heard from a diverse array of perspectives, including two presentations by ASWB, a nursing exam expert, and the Director of NASW-Illinois, who reviewed the effects of licensure reform efforts in that state. The workgroup determined that removing the exam at the Bachelors (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.

We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

Repeating a statement over and over again does not make it true. ASWB has had 40 years to provide proof that their exams are correlated with safe and effective social work practice, and it has not done so. ASWB only released pass rate data under incredible pressure, as it proved what social workers have colloquially known for years. Much as ASWB would like to convince you otherwise, there simply is no true way to objectively measure social work competence. Social work is a highly person-centered profession,

people are not standardized, and impossible-to-measure skills such as empathy are of ultimate importance to the field of social work. Research indicates that standardized tests are often culturally biased, relying on knowledge and reasoning shaped by dominant cultural norms. Differing knowledge and ways of thinking are a core strength of social work, but our licensing exams treat them as liabilities to be weeded out.

Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

In addition to not providing any type of measurement of social work skill, ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist.

Because of systemic racism and white supremacy, the wealth gap between white and Black people is 10:1. White people make ten times more than Black people. The licensing fees were no barrier for me as a white person with access to generational wealth that is not available to Black people due to systemic racism and white supremacy. The costs of the exam are an unnecessary barrier for Black people due to this racial wealth gap.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels. There is no evidence that lack of exams or exam removal have brought harm to the public. Because Illinois has some of the most easily accessible data and a slightly longer period of Masters level exam removal, they were studied in more detail in the Workgroup [final report](#) (page 36-37). Exam removal has had zero effect on the number of sanctions in that state.

Our BSWE is a member of the ASWB. It was one of few organizations afforded two seats on the Social Work Licensing Workgroup. Unfortunately, BSWE's allegiances are unclear and potentially problematic for a Maryland-based board. They consistently sided with ASWB's financial interests rather than centering the interests of Marylanders who are in desperate need of culturally responsive social work services. I applaud this legislation for increasing oversight by adding consumer members.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,  
Lynda Davis, LCSW-C  
District 12B

**testimony.pdf**

Uploaded by: Lynn Panepinto

Position: FAV

January 31, 2025

Dear Members of the Senate Finance Committee,

I am writing to you as a LCSW-C in the state of Maryland. I urge you to codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence; they are inherent in the design of standardized testing.

In response to the data release, Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October 2023. They have been meeting monthly and heard from a diverse array of perspectives. **The workgroup determined that removing the exam at the Bachelors (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.**

We also know that standardized testing bias means that **marginalized communities are deprived of representation in social work**. As a non-native Spanish speaker myself, I can personally attest to the fact that our state is in desperate need of bilingual, bicultural social workers. I know that qualified individuals are being kept from securing jobs in the social work field. Maryland needs to do better, not only for social workers seeking employment, but for clients who need to work with social workers who understand their culture.

Additionally, the exam does nothing to ensure social worker competence. Having taken ASWB exams at the LMSW and the LCSW level, I can assure you that preparing for the exam did not impart any new knowledge, and passing the exam did not prove that I am more fully equipped to handle situations that I encounter all the time in my work. The best way to assess foundational social work skills is through practical experience, supervision, and mentorship. **The exam does not make anyone a better or more qualified social worker**. Instead, it imposes a financial burden on people who have already invested a great deal of money in higher education and possibly supervision.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels. **There is no evidence that lack of exams or exam removal have brought harm to the public.**

We have a wonderful opportunity to remove outdated, biased licensing models and instead **modernize the social work licensing process in our state to address our behavioral health workforce demands**. *Please find a favorable report on SB379.*

Thank you,  
Lynn Panepinto, LCSW-C (#28441)  
Baltimore, MD 21218

**SB0379 - Maria Smith - Written Testimony.pdf**

Uploaded by: Maria Smith

Position: FAV



**To:** Maryland General Assembly, Senate Finance Committee

**Re:** SB0379 State Board of Social Work Examiners - Membership and Examination Requirements

**Position:** Favorable

February 4, 2025

Good Afternoon Chair Beidle and Members of the Senate Finance Committee,

Please accept the [final report](#) recommendations made by the [MD Workgroup on Social Work Requirements for Licensure](#) and **vote favorable** on **SB379**. This bill will add **greatly needed** accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and create a more equitable path to social work licensure i.e. **higher paying jobs for over a thousand Marylanders who are often already economically disenfranchised by society.**

#### **FAST FACTS**

- **Bachelors in Social Work** already have **400+ hours** of supervised practice. **Masters in Social Work** already have **900+ hours** of supervised practice.
- **Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, Vermont** have paused or removed exam barriers. There is **no evidence** that social workers licensed without an exam have been treated any differently.
- **1,227** more **Marylanders** with social work licensure could **fill statewide job vacancies** while allowing these **workers to make more money!**

Thank you for accepting my testimony. Please find a **favorable report** on **SB379**.

Sincerely,

Maria F. Smith, MSW, LCSW-C  
Rockville, Maryland  
District 18

# **MB\_Testimony.pdf**

Uploaded by: Marwah Bahanan

Position: FAV

Dear Members of the Senate Finance Committee,

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

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there simply is no true way to objectively measure social work competence. Social work is a highly person-centered profession, people are not standardized, and impossible-to-measure skills such as empathy are of ultimate importance to the field of social work. Research indicates that standardized tests are often culturally biased, relying on knowledge and reasoning shaped by dominant cultural norms. Differing knowledge and ways of thinking are a core strength of social work, but our licensing exams treat them as liabilities to be weeded out.

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As a social work student, it is important to me that my future workforce reflects the diversity of the communities that we serve in Maryland and the diversity of students that are a part of my social work program. Maryland's own [Behavioral Health Workforce Assessment](#) shows that MSW graduation rates are declining and that 70% of my cohort will not be serving Marylanders in a social

work capacity within one year of graduation. While this is not fully explained by ASWB exams, it is at least partially explained by it. This number also reflects my BIPOC, older, multilingual, and deaf colleagues who will avoid jobs that require licensure because they do not want to take exams that are stacked against them. Removing an exam that stops careers before they even begin can make social work a more attractive profession, increasing enrollment in MSW programs.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,

Marwah Bahanan

Class of 2025

District 3

# **Testimony of Matt DeCarlo in Support of SB0379.doc**

Uploaded by: Matthew DeCarlo

Position: FAV

**Testimony of Matt DeCarlo, MSW, Ph.D.**  
**February 4, 2025**  
**Maryland Senate Finance Committee**  
**In Support of Senate Bill 0379**

Good Afternoon Chair Beidle, Vice Chair Hayes, and distinguished members of the Senate Finance Committee,

My name is Matt DeCarlo and I am the MSW Program Director at Saint Joseph’s University and co-founder of Open Social Work, which advances open practices in our discipline. I am testifying in my personal capacity as a social worker (not on behalf of my employer) and professional capacity as a social work researcher and advocate.

My research focuses in large part on open workforce reforms, and specifically, social work licensure. I appreciate the opportunity to offer testimony in support of SB0379.

Please see the attached fact sheets, grounded in my years of research on the Association of Social Work Boards examination program.

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# ASWB: A Uniquely Profitable “nonprofit”

In 2010, [Albright & Thyer](#) found that MSW students could easily guess the correct answer on Association of Social Work Boards (ASWB) practice examinations without knowing the question, simply based on how answers were phrased. In their abstract, they stated:

“The multimillion dollar social work testing industry is big business; both the profession and the public, which relies heavily on the gate-keeping function of these tests, deserve greater transparency and accountability with respect to their legitimacy” (p. 229)

ASWB has not provided any transparency on the validity or reliability of its exams. However, ASWB is required to be transparent in tax reporting.

Using the [ProPublica Nonprofit explorer for ASWB](#), this brief collects data reported by ASWB to the Internal Revenue Service (IRS). It also uses ASWB’s annual reports posted to the [aswbannualreport.org](#) website from 2015-2021. Finally, it uses data from [ASWB’s Exam Pass Rate Analysis](#), which differentiates between first-time and repeat test-takers from 2011-2021.

## Recession-Proof Profits

Since 2011, ASWB has posted recession-proof profit margins rivaling Fortune 500 companies.

- From 2011 to 2021, ASWB’s net assets increased by 4.5x.
- ASWB’s net assets in 2021 were over \$40,000,000, up from \$9,000,000 in 2011.
- In 2021, ASWB’s profit margin was 29% with \$24,000,000 in total revenue.
- ASWB’s profit margin has averaged 17% since 2011.
- ASWB holds a \$30 million investment portfolio managed by Morgan Stanley.

## How Profitable is ASWB?



	2011	2012	2013	2014	2015	2016
LCSW first-time test-takers	9,100	9,604	10,879	12,217	13,044	14,007
LMSW first-time test-takers	11,260	12,732	13,110	14,184	15,214	15,496
LBSW first-time test-takers	3,164	3,251	3,595	3,873	4,083	4,113
Repeat test-takers	--	--	--	--	11,457	11,127
ASWB exam revenue	--	--	--	--	\$ 11,345,503	\$ 11,689,451
ASWB publishing revenue	--	--	--	--	\$ 1,686,190	\$ 1,489,956
ASWB net assets	\$ 8,995,137	\$ 10,612,898	\$ 13,079,412	\$ 15,680,159	\$ 17,750,104	\$ 19,693,116
ASWB total revenue	\$ 9,461,425	\$ 10,279,908	\$ 11,492,614	\$ 12,692,553	\$ 13,964,190	\$ 13,767,709
ASWB profit margin	10.61%	14.57%	20.64%	22.26%	19.47%	8.45%

	2016	2017	2018	2019	2020	2021
LCSW first-time test-takers	14,007	16,095	16,022	17,207	16,801	20,657
LMSW first-time test-takers	15,496	16,884	16,812	18,231	16,716	21,650
LBSW first-time test-takers	4,113	4,462	3,711	3,583	2,709	3,494
Repeat test-takers	11,127	12,617	13,478	19,526	15,521	20,720
ASWB exam revenue	\$ 11,689,451	\$ 12,996,484	\$ 13,277,694	\$ 14,410,319	\$ 13,735,930	\$ 17,659,247
ASWB publishing revenue	\$ 1,489,956	\$ 1,562,915	\$ 1,704,718	\$ 1,751,079	\$ 1,684,234	\$ 2,123,620
ASWB net assets	\$ 19,693,116	\$ 23,289,150	\$ 24,046,614	\$ 28,831,413	\$ 33,841,553	\$ 40,273,169
ASWB total revenue	\$ 13,767,709	\$ 15,565,636	\$ 16,344,808	\$ 17,595,886	\$ 16,234,758	\$ 24,599,963
ASWB profit margin	8.45%	14.85%	16.52%	15.56%	18.46%	29.08%

## Educated but excluded

Exams are a bottleneck for aspiring social workers, and the problem is getting worse.

- Repeat test-takers comprise about 30% of all LCSW, MSW, and BSW examinees
- Since 2011, the number of repeat test-takers grew by 86%.
- Repeat-test takers grew at twice the rate as first-time examinees (43%).
- In 2021 and 2019, there were more repeat test takers than first-time LMSW examinees.

Repeat test-takers calculation: I subtracted first-time test-takers reported in ASWB's Exam Pass rate Analysis from the total test takers reported in ASWB's Annual Report. 2021 was the only year that ASWB reported first-time test-takers of Advanced Generalist and Associate levels of exams, so I applied those figures to previous years as a best guess. There are few test-takers at these levels. All other data are copied directly from ASWB's public reports.

# ASWB Secretly Deletes Biased Items

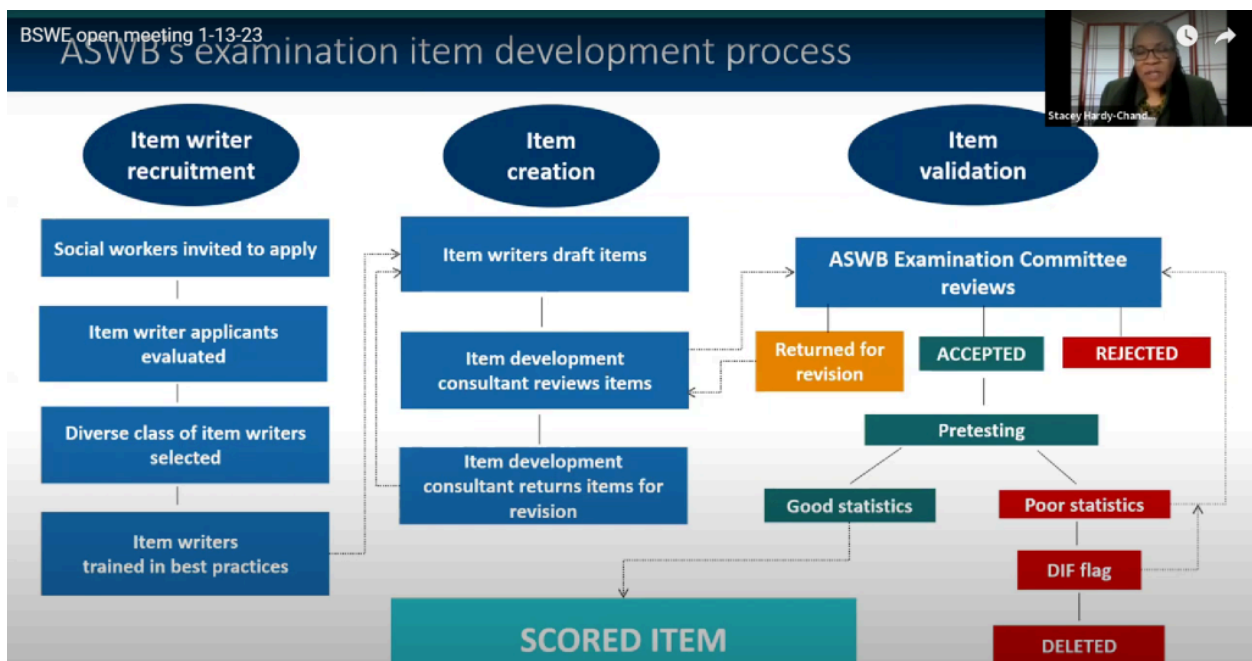
ASWB follows psychometric best practices by pretesting all items for Differential Item Functioning (DIF) before they are used as scored items on the examination. Items that demonstrate DIF are removed or revised by subject matter experts. Revised items are pretested again to demonstrate that DIF has been resolved prior to moving items into the live, scored section of the examination. As ASWB's CEO, Dr. Stacey Hardy Chandler stated [in a zoom webinar with Dr. Jennifer Klafehn](#), a representative from ASWB's psychometrics consultant:

SHC: I actually want to start and clarify because if I were in the audience, I would want clarity on this. You talked about items being flagged for DIF. Can you clarify at what point those items are deleted. In other words, the test item phase in terms of impacting scores.

JK: So they are deleted at the pretesting phase.

SHC: Just wanted to clarify that those do not impact scores when they are identified. (ASWB, 2023b, 53:39)

This is mirrored in the flowchart ASWB provides to its member boards about the DIF procedure.



According to these ASWB sources, scored items are *never* removed for statistical bias.

# ASWB Monitors & Removes Scored Items for DIF

Contrary to these statements, ASWB's public statements (a small sample of which are reproduced below) describe the procedure for evaluating *and removing scored items* for bias.

In the [current ASWB examination guidebook](#) ASWB explains:

“psychometric experts use statistical tracking of responses to determine whether each question measures competence effectively and fairly. Exams are built using only scored questions that have met these rigorous standards. **All questions continue to be monitored by psychometric experts to prevent any scored questions from being used that do not meet standards for fairness.**” (p. 8)

“All ASWB examination questions are monitored to ensure that there is nothing in the content that would provide an advantage to one demographic group over another. This evaluation occurs during the pretest phase—before questions are included in the scored question bank—and **continues while they are used as scored questions**” (p. 21).

In a [2021 issue of the New Social Worker](#), Stacey Owens, ASWB Item Development Consultant gave rough statistics:

The first tool ASWB uses is a testing industry statistical measurement called Differential Item Functioning (DIF). DIF indicates whether an exam question shows tendencies to advantage or disadvantage one group of test-takers over another (ASWB, 2020). DIF is identified by statistically analyzing responses to the exam questions—called items—during pretesting. **Scored items are continually monitored for DIF.** On an annual basis, less than 5% of all items released show DIF. Items flagged for DIF are removed from the bank of potential exam questions. (para. 3)

In a [2020 article in Social Work Today](#), ASWB Examination Director Lavina Harless confirmed:

“Monitoring of item performance doesn't end once an item moves out of pretest status. **Scored items are continually monitored** to ensure that performance doesn't slip. **If a scored item demonstrates a statistically significant drop** in performance, it is **taken out of use and returned to the examination committee for review.** Should the committee decide to edit and keep the item, it returns to pretest status” (para. 12).

In ASWB's [2023 Testing Enhancements webinar](#), Examination Director Harless detailed:

“What if then people start to get it wrong? Again, because we do our research ahead of time, that doesn't typically happen. **If we see something that looks like maybe there's a shift in practice or something occurring, we'll pull those test questions down** and take a look at those with our subject matter experts on our Examination Committee” (57:20)

# Invalid Licensure Decisions

It is common for social workers to fail the ASWB examination by 1 or 2 points. If 1 or 2 items were later found by ASWB to have bias, it would invalidate the licensure decision for that person.

Test-takers and boards have a right to know when a scored exam item, used to make a licensure decision, was later removed by ASWB because it demonstrated statistical bias. For this reason, ASWB exams are a poor fit for licensure because the true cut score is likely to change over time.

If ASWB followed the code of ethics and reported when exam items removed for bias impacted licensure decisions, social work boards would find it difficult to license social workers in a predictable and legally defensible manner.

## A Growing Problem

ASWB publicly reported 5x higher DIF in its 2021 exams than in 2010 exams.

- In 2011, [Marson and colleagues](#) reported less than 1% of exam items showed DIF.
- In 2021, [Stacey Owens](#) reported less than 5% of items were flagged for DIF.

ASWB examinations are 170 questions long, with 20 unscored items.

- DIF appears in up to 8 or 9 questions (5%) of the 170 question exam.

ASWB reports this “usually” does not happen, but that when it does, there is no procedure for notifying the affected parties. This is a grievous ethical lapse.

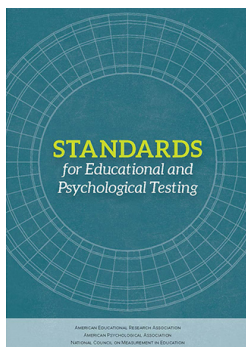
[ASWB's \(2021\) Manual for New Board Members](#) states “when consistent DIF is identified in an item—**usually** [emphasis added] in pretest items that are being pretested for possible scored use—the item is deleted from the item bank” (p. 20).

In their blog post on measurement fairness and [accompanying PowToons video](#) ASWB states that “when an item shows DIF, **usually** [emphasis added] in the pretest stage, the question goes no further” (1:30).

## How many scored items has ASWB removed for biased statistical functioning? They won't share data.

# ASWB Violates Psychometric Standards

ASWB cites as its principal source of psychometrics the [Joint Standards for Educational and Psychological Testing](#) by the National Council on Measurement in Education, the American Educational Research Association, and the American Psychological Association.



“The purpose of the *Standards* is to provide criteria for the development and evaluation of tests and testing practices and to provide guidelines for assessing the validity of interpretations of test scores for the intended test uses. Although such evaluations should depend heavily on professional judgment, the *Standards* provides a frame of reference to ensure that relevant issues are addressed. All professional test developers, sponsors, publishers, and users should make reasonable efforts to satisfy and follow the *Standards* and should encourage others to do so. **All applicable standards should be met by all tests and in all test uses unless a sound professional reason is available to show**” (p. 1)

“Although the *Standards* is not enforceable by the sponsoring organizations, it has been repeatedly recognized by regulatory authorities and courts as setting forth the generally accepted professional standards that developers and users of tests and other selection procedures follow. Compliance or noncompliance with **the Standards may be used as relevant evidence of legal liability in judicial and regulatory proceedings**. The *Standards* therefore merits careful consideration by all participants in the testing process” (p. 2)

ASWB follows some of these standards, but it ignores important standards during the exam validation process. Because of these violations, exam cut scores are systematically biased.

## New ASWB Questions are 8% Easier

ASWB announced [Testing Experience Enhancements on their blog](#). Beginning in January 2023, ASWB changed their examination format from 4-option questions (A, B, C, or D) to 3-option questions (A, B, or C) “with the goal of completing the transition by 2025” (para. 3).

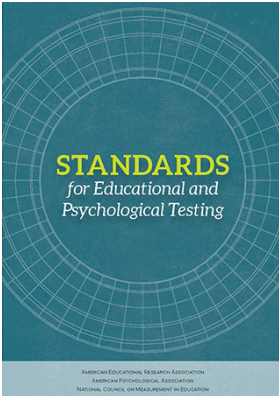
It is true that the choice between 3-option and 4-option questions can be equally valid, but it is statistically unknown what the impact on the validity of cut scores would be.

- Items without a 4th option are 8% easier to guess correctly (25% vs. 33%)
- 3 options take 25% less time to read than 4 options across a 4-hour, 170-item exam.

**If the exam is easier, the cut score should increase.**

# Are 2018 Blueprint Cut Scores Still Valid?

Changing the number of answer options is a major, untested, shift. ASWB did not calculate new cut scores for a mix of 3 & 4-option exams. This is a violation of the *Standards* which require:



Standard 7.14: When substantial changes are made to a test, **the test's documentation should be amended, supplemented, or revised** to keep information for users current and to provide useful additional information or cautions.

Comment: ...**When substantial changes are made to items and scoring, information on the extent to which the old scores and new scores are interchangeable should be included in the test documentation.** Sometimes it is necessary to change a test or testing procedure to remove construct-irrelevant variance that may arise due to the characteristics of an individual that are unrelated to the construct being measured (e.g., when testing individuals with disabilities). **When a test or testing procedures are altered, the documentation for the test should include a discussion of how the alteration may affect the validity and comparability of the test scores, and evidence should be provided to demonstrate the effect of the alteration on the scores** obtained from the altered test or testing procedures, if sample size permits.

Clearly, ASWB makes changes to their examinations without proper psychometric evidence showing the altered test format is psychometrically equivalent to the old examinations.

ASWB is required to test whether these three groups have equivalent scores. They did not do so.

1. Pre-2023 Exams with 170 4-option questions.
2. 2022-2025 Exams with an unknown mix of 3-option and 4-option questions.
3. 2025 Exams and beyond, with 3-option questions.

ASWB announced that eliminating an answer option would address concerns about construct-irrelevant variance—“reducing time pressure and ensur[e] a focus on a test-taker’s social work knowledge” (para. 3). Clearly ASWB hoped that using 3-option items would improve test scores.

But it never re-calculated cut scores with the new question format. Is it true, as ASWB says in their Exam Guidebook, that “no test-taker receives an advantage or disadvantage because of the version of exam received (p. 20)?

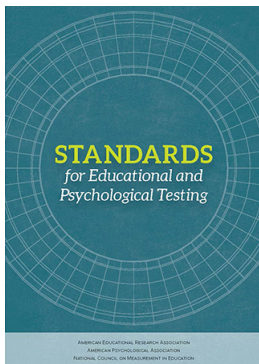
**ASWB reports never testing if 3- or 4-option exams are psychometrically equivalent, but ASWB’s examination program relies on the equivalency of exams across years.**



# ASWB Ignores Required Validation & Equity Tests

ASWB started using this new question format in the wake of the 2022 Exam Pass Rate Analysis which demonstrated systematic bias in favor of younger white social workers.

Contrary to ASWB's response to exam inequities, the *Standards* do not direct test-makers like ASWB to eliminate an answer option when systematic biases emerge. Rather, in Standard 2.15, the *Standards* require ASWB to conduct at least one of two specific psychometric tests to estimate the multivariate impact of race, age, and language on scores.



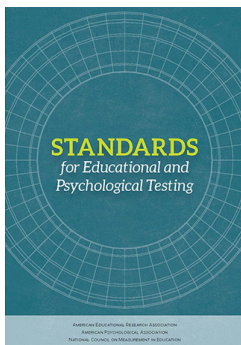
Standard 2.15: When there is credible evidence for expecting that **conditional standard errors of measurement or test information functions** will differ substantially for various subgroups, investigation of **the extent and impact of such differences should be undertaken and reported as soon as is feasible.** (emphasis added)

Comment: If differences are found, they should be clearly indicated in the appropriate documentation. In addition, if substantial differences do exist, **the test content and scoring models should be examined** to see if there are legally acceptable alternatives that do not result in such differences. (p. 46)

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ASWB does not calculate the Conditional Standard Error of Measurement or Test Information Function for minoritized social workers. Why is this important? The *Standards* are clear:

“When a test score or composite score is used to make classification decisions (e.g., pass/fail, achievement levels), the standard error of measurement at or near the cut scores has important implications for the trustworthiness of these decisions...



Standard 2.14: When possible and appropriate, conditional standard errors of measurement should be reported at several score levels unless there is evidence that the standard error is constant across score levels. **Where cut scores are specified for selection or classification, the standard errors of measurement should be reported in the vicinity of each cut score.**

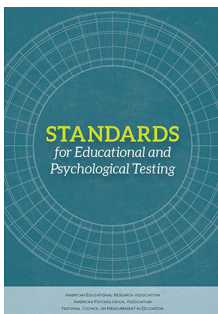
Comment: Estimation of conditional standard errors is usually feasible with the sample sizes that are used for analyses of reliability/precision. **If it is assumed that the standard error is constant over a broad range of score levels, the rationale for this assumption should be presented.** The model on which the computation of the conditional standard errors is based should be specified” (p. 47).

ASWB does not calculate or report conditional standard errors or test information functions of its exams, despite the clear mandate from Standard 2.15 to do so *as soon as is feasible*.

# Validation is Key for Exam Precision

ASWB examinations use Item Response Theory (IRT) to evaluate exam items, but they do not use it to evaluate the exam as a whole. [Bean \(2022\)](#) highlights how IRT tests like those required in the *Standards*—conditional standard error of measurement or test information function—reveal important information for validity, reliability, and fairness.

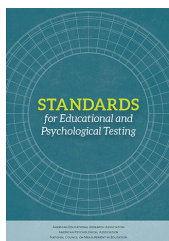
In common terms, IRT analyzes whether the examination is appropriately precise *for test-takers whose true ability is near the cut score*. An examination for licensure should be most precise at the decision-point. An examination that was most precise for excellent or abysmal social workers would be invalid for use as an examination. For this reason, calculating the test information function and conditional standard error of measurement are crucial to understanding the cause of systematic biases. As the *Standards* describe:



“The **standard error of measurement, as such, provides an indication of the expected level of random error over score points and replications for a specific population**. In many cases, it is useful to have estimates of the standard errors for individual examinees (or for examinees with scores in certain score ranges). These conditional standard errors are difficult to estimate directly, but can be estimated indirectly. For example, the test information functions based on IRT models can be used to estimate standard errors for different values of a latent ability parameter and/or for different observed scores” (p. 37).

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The *Standards* also describe the purpose of calculating the test information function:



“The test information function, an important result of IRT, summarizes how well the test discriminates among individuals at various levels of ability on the trait being assessed... The information function may be viewed as **a mathematical statement of the precision of measurement at each level of the given trait**. The IRT information function is based on the results obtained on a specific occasion or in a specific context, and therefore it does not provide an indication of generalizability over occasions or contexts” (p. 38).

In 2023, ASWB rejected a (\$0) proposal from two social work psychometric experts and this author to perform these tests in the open source R stats program. ASWB did not provide access to their data to conduct the required psychometric validation tests.

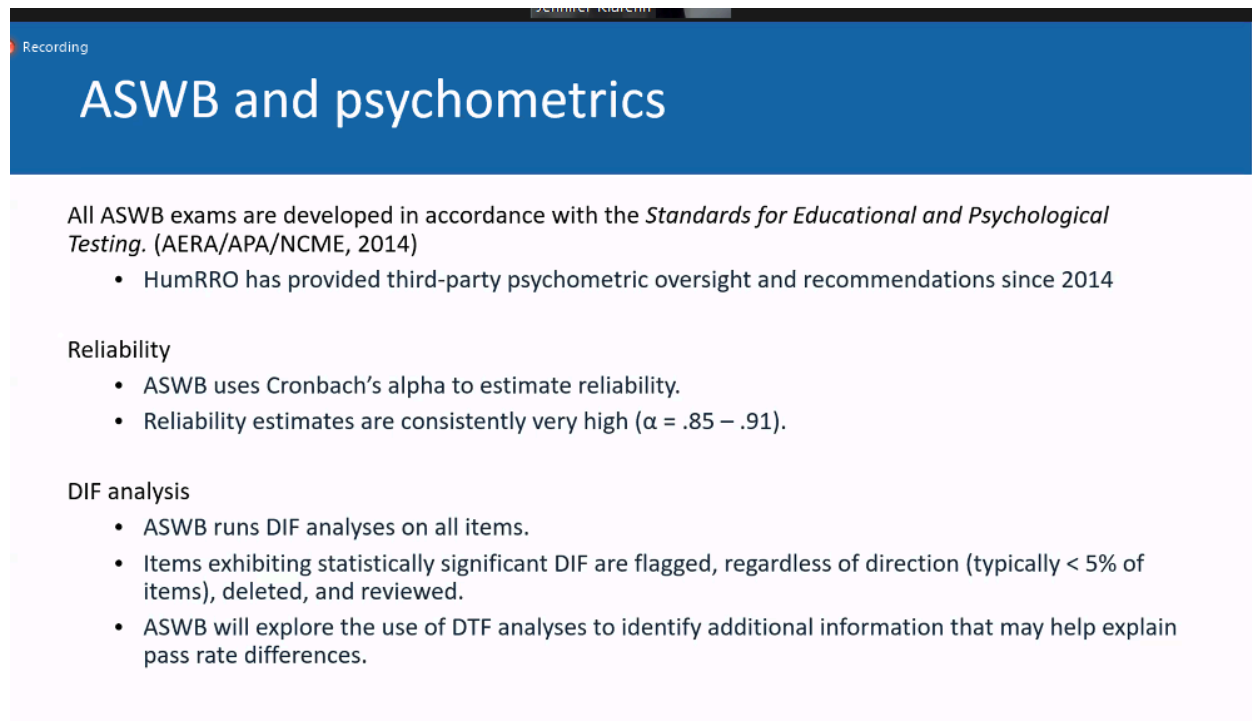
Instead, ASWB assumes, without testing, that the conditional standard error of measurement and test information functions are equivalent across demographic groups. As the standards make clear, ASWB must provide evidence to support empirical assumption that these psychometric properties are equivalent across impacted groups.



# ASWB Exams Are Inadequately Documented

ASWB provides inadequate documentation of their examination psychometrics, but even these small details reveal a clear explanation for how inequitable exams got worse.

In 2023, ASWB reported the only public psychometrics data since 2011. Here is a screenshot of the only slide in [a 60-minute presentation](#) that addressed validity & reliability:



The screenshot shows a presentation slide with a blue header containing the title "ASWB and psychometrics" and a "Recording" indicator. The main content area is white and contains the following text:

All ASWB exams are developed in accordance with the *Standards for Educational and Psychological Testing*. (AERA/APA/NCME, 2014)

- HumRRO has provided third-party psychometric oversight and recommendations since 2014

**Reliability**

- ASWB uses Cronbach's alpha to estimate reliability.
- Reliability estimates are consistently very high ( $\alpha = .85 - .91$ ).

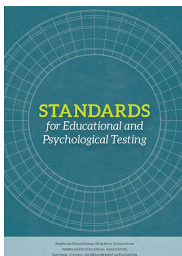
**DIF analysis**

- ASWB runs DIF analyses on all items.
- Items exhibiting statistically significant DIF are flagged, regardless of direction (typically < 5% of items), deleted, and reviewed.
- ASWB will explore the use of DTF analyses to identify additional information that may help explain pass rate differences.

State boards do not receive any more information. According to a live ASWB's contract:

"ASWB will provide... the number of exams administered; the total number of items on the examination; the range of scores (lowest to highest); the mean and standard deviation taken from the annual technical report; and the Kuder-Richardson Formula 20 (K-R-20) Reliability Coefficient" (California BBS, p. 6).

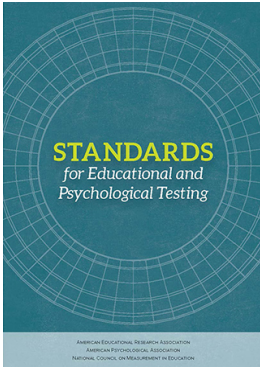
This is plainly inadequate documentation according to the *Standards* for documenting reliability.



**The reporting of indices of reliability/precision alone**—with little detail regarding the methods used to estimate the indices reported, the nature of the group from which the data were derived, and the conditions under which the data were obtained—**constitutes inadequate documentation**. General statements to the effect that a test is “reliable” or that it is “sufficiently reliable to permit interpretations of individual scores” are rarely, if ever, acceptable...test constructors and publishers are obligated to provide sufficient data to make informed judgments possible.

# ASWB Clearly Violates Documentation Standards

ASWB is obligated to provide more psychometric data, as Standard 2.19 documents.



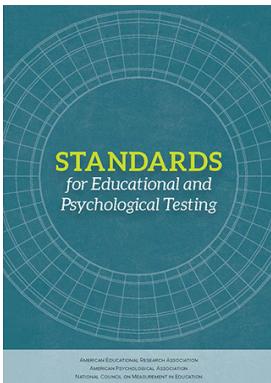
Standard 2.19: Each method of quantifying the reliability/precision of scores should be described clearly and expressed in terms of statistics appropriate to the method. The sampling procedures used to select test takers for reliability/precision analyses and the descriptive statistics on these samples, subject to privacy obligations where applicable, should be reported.

Comment: Information on the method of data collection, sample sizes, means, standard deviations, and demographic characteristics of the groups tested helps users judge the extent to which reported data apply to their own examinee populations...

Because there are many ways of estimating reliability/precision, and each is influenced by different sources of measurement error, **it is unacceptable to say simply, "The reliability/precision of scores on test X is .90."** A better statement would be, "The reliability coefficient of .90 reported for scores on test X was obtained by correlating scores from forms A and B, administered on successive days. The data were based on a sample of 400 10th-grade students from five middle-class suburban schools in New York State. The demographic breakdown of this group was as follows: . . .' (p. 47)

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ASWB clearly does not follow the standards for documenting the reliability of its exams. This is a problem for reliably measuring social work competence across racial, cultural, linguistic, and age groups. Because it produces a high-stakes exam, documentation requirements are higher!



Standard 2.0: Appropriate evidence of reliability/precision should be provided for the interpretation for each intended score use.

Comment: The form of the evidence (reliability or generalizability coefficient, information function, conditional standard error, index of decision consistency) for reliability/precision should be appropriate for the intended uses of the scores, the population involved, and the psychometric models used to derive the scores. **A higher degree of reliability/precision is required for score uses that have more significant consequences for test takers.** Conversely, a lower degree may be acceptable where a decision based on the test score is reversible or dependent on corroboration from other sources of information.

**Social Work Boards must enforce these standards.**

# ASWB Ruined Its Exams' Reliability

ASWB did not document why it stopped using Item Response Theory to measure exam reliability and started using Cronbach's Alpha.

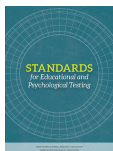
In 2011, ASWB's prior psychometricians criticized the use of Cronbach's Alpha and attested that ASWB exams produced during that time were subject to decision consistency analysis:

" The ASWB examinations have shown high reliability estimates, in the nineties, both by the preferred advanced IRT model (decision consistency in pass/fail decisions) and the less relevant classical standards (KR-20, test reliability measure as shown by its internal consistency)" (p. 89)

## In 2024, ASWB uses less advanced reliability tests than in the 1990s.

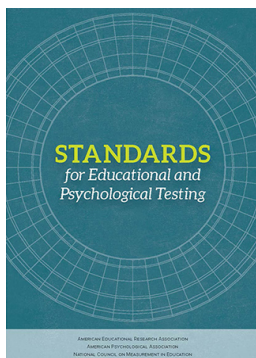
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ASWB's new psychometric consultants apparently do not agree with their psychometricians from the 1990s through the early 2010s that classical test theory measures are "less relevant" to ASWB exam reliability than decision consistency. Because ASWB does not adequately document its exams, we do not know why this change was made or its impact on the equivalence of exam scores. However, we do know they stopped using decision consistency, which violates the *Standards*.



Standard 2.16: **When a test or combination of measures is used to make classification decisions**, estimates should be provided of the **percentage of test takers who would be classified in the same way** on two replications of the procedure. (p. 46)

Instead of reporting decision consistency, *which ASWB did in the 1990s*, ASWB uses only internal consistency reliability. Moreover, ASWB is required by the *Standards* to report reliability for each relevant subgroup, such as those with different linguistic or cultural backgrounds:



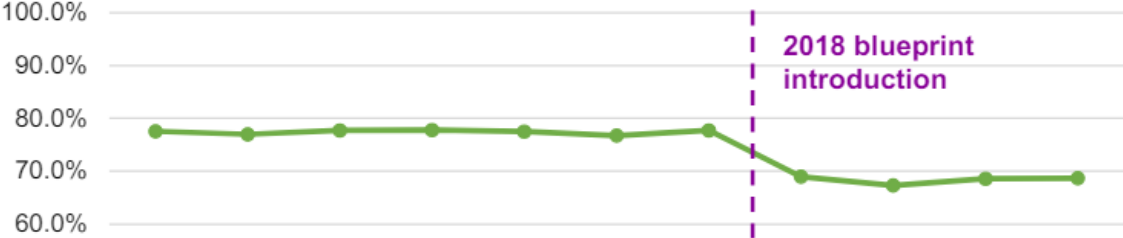
Standard 2.11: Test publishers should provide estimates of reliability/precision as soon as feasible **for each relevant subgroup** for which the test is recommended.

Comment: Reporting estimates of reliability/precision for relevant subgroups is useful in many contexts, but it is especially important if the interpretation of scores involves within-group inferences (e.g., in terms of subgroup norms). For example, **test users who work with a specific linguistic and cultural subgroup** or with individuals who have a particular disability would **benefit from an estimate of the standard error for the subgroup**. (p. 45)

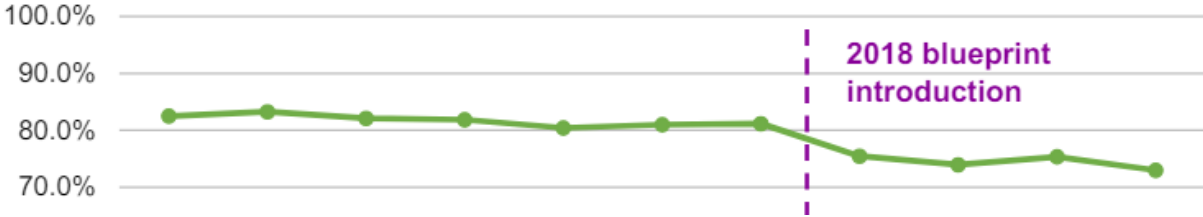
# Broken Exams, Broken Workforce

In 2018, after new exams were introduced, the pass rate for *all social workers* reduced by about 10%. According to [ASWB’s Exam Pass Rate Analysis](#):

**Figure 15. 2011–2021 Bachelors exam first-time pass rates by year and eventual pass rate**



**Figure 8. 2011–2021 Masters exam first-time pass rates by year and eventual pass rate**



## White Test-Takers Improve, Others Worsen

For the MSW exam, first-time and eventual pass rates demonstrate wide disparities across demographic groups from 2018-2021.

- White: 85-88% pass on their first time, regardless of age. Eventually, 91% pass.
- Black: 45% pass on their first time. 30% of over 50 pass first time. Eventually, 52% pass.
- Latine: 64% pass on their first time. 45% of over 50 pass first time. Eventually, 71% pass.
- English-secondary: 52% pass on their first time. Eventually 63% pass.

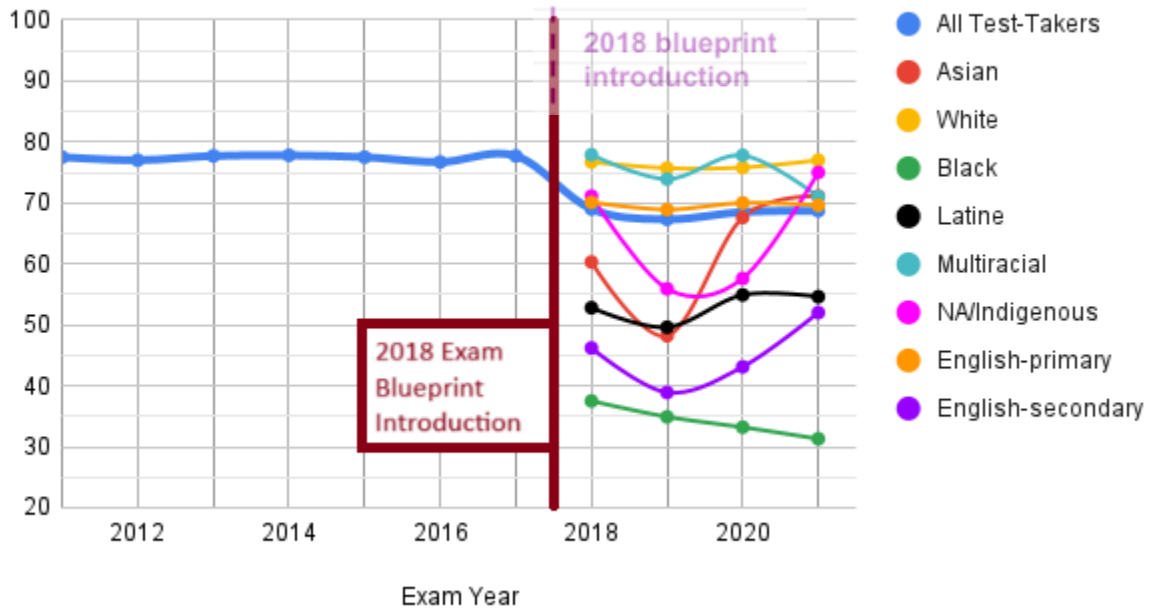
Because ASWB does not report equity data prior to 2018, it is impossible to know precisely how test-takers were impacted by the 2018 blueprint change.

But it is obvious these changes made exam inequity worse! After 2018:

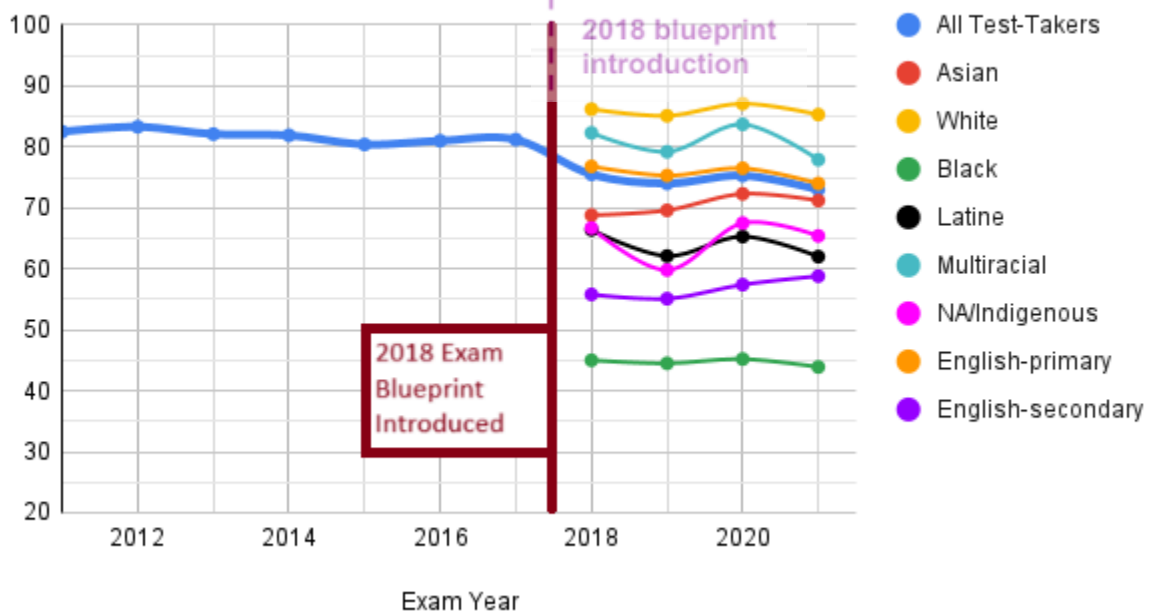
- White social workers’ test scores were at least 10% above the national average.
- Minoritized social workers’ scores were 20-40% less than the national average.

Here is a visual representation of the gap in exam scores reported by ASWB in their 2022 Exam Pass Rate Analysis by demographics. These indicate that white test-takers were least impacted by the 2018 exam blueprint and minoritized social workers were most impacted.

Impact of 2018 Blueprint on Bachelors Exam Pass Rates by Demographic



Impact of 2018 Blueprint on Masters Exam Pass Rates by Demographic



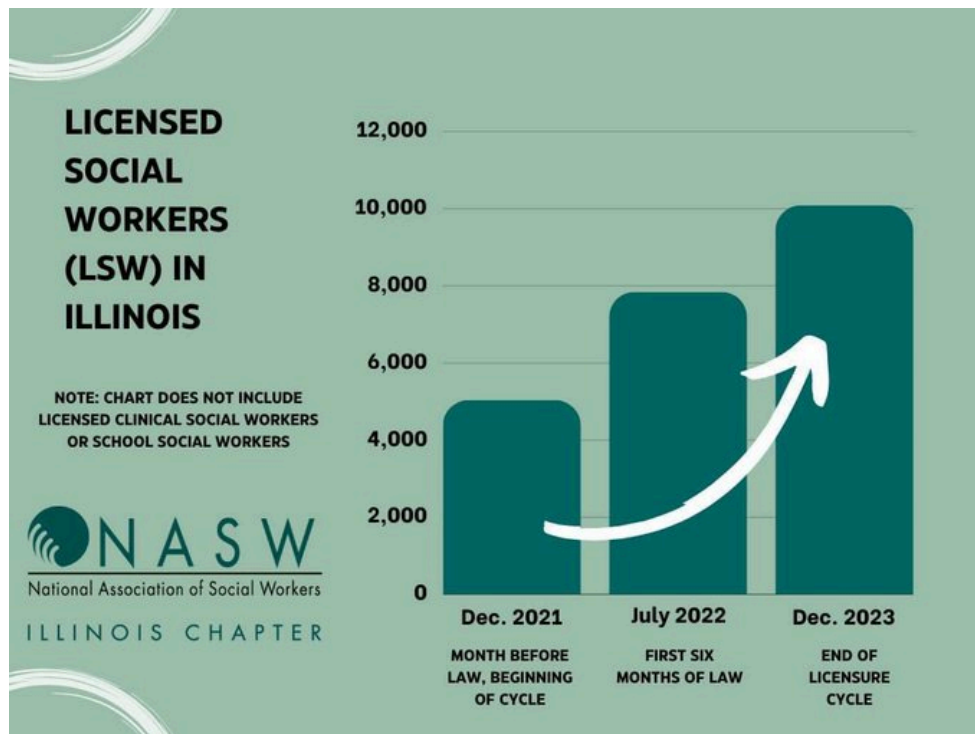
Likely, the 2018 examination blueprint made an already-inequitable exam less valid and fair.

## Exam Pass Rates = Licensure Rates

Because exams are required for licensure, the workforce is missing the educated social workers who cannot pass the exams. Licensure and exam pass rates by demographic are highly similar.

Demographic group	<a href="#">ASWB Report</a> First-time Pass Rate for MSW Exam	<a href="#">Senreich &amp; Dale</a> MSW Licensees in New York
White social workers (any age)	86%	78%
Black social workers (any age)	45%	48%
Latine social workers (any age)	64%	60%
Older Black social workers	30%	31%
Older Latine social workers	45%	39%
Older MSWs (any race)	65%	50%

## When [Illinois](#) Eliminated the Exam



# **MDAD SB 379 - State Board of Social Work Examiners**

Uploaded by: MDAD President MDAD President

Position: FAV





**Maryland Association of the Deaf**  
**Written Testimony**  
**SB 379 - State Board of Social Work Examiners - Membership**  
**and Examination Requirements**  
**Tuesday, February 4, 2025**  
**Position: Favorable**

**President**

Tina Joyner

The Maryland Association of the Deaf (MDAD) is a statewide organization that protects the interests of Deaf, DeafBlind, and Hard of Hearing Marylanders regarding accessibility and equality issues.

**Vice President**

Jacob Leffler

MDAD supports the bill, SB 379, that is sponsored by Senator Washington. Many Deaf, DeafBlind, and Hard of Hearing people who graduated with a Social Work degree from Gallaudet and other universities are struggling with the Social Worker Examination for numerous reasons. For many Deaf, DeafBlind, and Hard of Hearing candidates, the linguistic structure of the test items (problematic from the outset because this population has a different experience acquiring and accessing English) and cultural bias of the examination has profoundly impacted access to licensure, employment, ability to serve their population, and advancement in their profession.

**Secretary**

Tiasha Bera

**Treasurer**

Allysa Dittmar

Oftentimes, Deaf, DeafBlind, and Hard of Hearing people's first language is not English, so they learn English in school. We are less exposed to multiple meanings to the words, especially the kind of English used on standardized tests. We do not have access to incidental learning through English or another language spoken in our environment. Hearing test-takers who are native English language speakers can use strategies that are auditorily based to determine the correct answer. They can fill in information based on unhampered access to the language; strategies that may be more difficult for Deaf, DeafBlind, and Hard of Hearing test-takers.

**Board Members**

Meredith DeSomma

Vikki Porter

Blaise Delahoussaye

Philip Mecham

Thelma Schroeder

Another issue that is faced in our community is that there are not enough Deaf Licensed Clinical Social Workers who can supervise other Deaf and Hard of Hearing individuals with social work degrees to meet their hours to get a license. With that, Deaf, DeafBlind, and Hard of Hearing candidates have to communicate with hearing social workers through an interpreter and many of them do not understand Deaf Culture and how we address issues as a Deaf individual. Deaf, DeafBlind, and Hard of Hearing candidates prefer to have direct communication and for someone to understand their lived experiences.

The passing of this bill will address these issues and create more opportunities for Deaf, DeafBlind, and Hard of Hearing Social Workers to practice in the State of Maryland.

We look forward to a favorable outcome to SB 379.

MDAD Board of Directors



# **Dear Members of the Senate Finance Committee.pdf**

Uploaded by: Megan McKernan

Position: FAV

Dear Members of the Senate Finance Committee,

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence, but are inherent in the design of standardized testing, which has consistent bias against already marginalized groups.

In response to the data release, Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October, 2023. They have been meeting monthly and heard from a diverse array of perspectives, including two presentations by ASWB, a nursing exam expert, and the Director of NASW-Illinois, who reviewed the effects of licensure reform efforts in that state. The workgroup determined that removing the exam at the Bachelors (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.

We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

Repeating a statement over and over again does not make it true. ASWB has had 40 years to provide proof that their exams are correlated with safe and effective social work practice, and it has not done so. ASWB only released pass rate data under incredible pressure, as it proved what social workers have colloquially known for years. Much as ASWB would like to convince you otherwise,

there simply is no true way to objectively measure social work competence. Social work is a highly person-centered profession, people are not standardized, and impossible-to-measure skills such as empathy are of ultimate importance to the field of social work. Research indicates that standardized tests are often culturally biased, relying on knowledge and reasoning shaped by dominant cultural norms. Differing knowledge and ways of thinking are a core strength of social work, but our licensing exams treat them as liabilities to be weeded out.

Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

In addition to not providing any type of measurement of social work skill, ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels. There is no evidence that lack of exams or exam removal have brought harm to the public. Because Illinois has some of the most easily accessible data and a slightly longer period of Masters level exam removal, they were studied in more detail in the Workgroup [final report](#) (page 36-37). Exam removal has had zero effect on the number of sanctions in that state.

Our BSWE is a member of the ASWB. It was one of few organizations afforded two seats on the Social Work Licensing Workgroup. Unfortunately, BSWE's allegiances are unclear and potentially problematic for a Maryland-based board. They consistently sided with ASWB's financial interests rather than centering the interests of Marylanders who are in desperate need of culturally responsive social work services. I applaud this legislation for increasing oversight by adding consumer members.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our

behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,

Megan McKernan, LCSW-C

Maryland Congressional District 3

**testimony SB 379 (1).pdf**

Uploaded by: Melissa Buckley

Position: FAV

Dear Members of the Senate Finance Committee

I am honored to submit this testimony in strong support of Maryland Senate Bill 379 (SB 379), which seeks to eliminate examination requirements for bachelor and master social work licenses and to increase consumer representation on the State Board of Social Work Examiners.

As the Chair of the Department of Social Work at Coppin State University and a practicing LMSW therapist, I recognize the urgent need to remove unnecessary barriers to licensure that disproportionately impact aspiring social workers from diverse backgrounds. The proposed elimination of examination requirements aligns with a growing body of research demonstrating that licensure exams present significant structural barriers for individuals from historically marginalized communities, particularly Black, Indigenous, and people of color candidates. Studies have shown disparities in pass rates, raising concerns that these exams do not effectively measure competency but instead function as gatekeeping mechanisms that restrict access to the profession. By removing this requirement, Maryland will foster a more inclusive and representative social work workforce, ensuring that skilled professionals can serve communities in need without undue hardship.

Furthermore, the proposed modification to the composition of the State Board of Social Work Examiners—expanding consumer representation from two to four members—is a critical step toward enhancing public trust and accountability. As we know, **representation matters**. Including a broader range of consumer voices ensures that the Board reflects the diverse perspectives and lived experiences of the communities social workers serve. This change will promote transparency, equity, and a more holistic approach to regulating the profession.

Maryland is facing a pressing need for well-trained social workers, particularly in underserved areas where mental health services, child welfare support, and community interventions are desperately needed. The passage of SB 379 will help address workforce shortages by streamlining the licensure process while upholding the high ethical and professional standards of the field. By removing restrictive examination requirements and enhancing Board representation, we take a bold step toward equity, accessibility, and justice in social work.

I urge this committee to vote **in favor** of SB 379 and support this necessary reform to strengthen Maryland's social work profession and its commitment to serving the most vulnerable populations. Thank you for your time and consideration.

**Melissa E. Buckley, PhD, MSW, LMSW**  
District 43A

**SB379 FAV - NAMI.pdf**

Uploaded by: Michael Gray

Position: FAV



February 4, 2025

Chair Beidle, Vice Chair Hayes, and distinguished members of the Finance Committee,

The National Alliance on Mental Illness (NAMI)-Maryland respectfully requests a favorable report on SB379.

NAMI Maryland and our 11 local affiliates across the state represent a network of more than 58,000 families, individuals, community-based organizations, and service providers. NAMI Maryland is a 501(c)(3) non-profit dedicated to providing education, support, and advocacy for people living with mental illnesses, their families, and the wider community.

Maryland is facing a growing demand for social workers, particularly in mental health services. By eliminating the repealing examination requirements for bachelor and master social worker licenses, we could help increase the number of qualified professionals entering the field. We know that these individuals are qualified because of their baccalaureate or master's degree that they have obtained.

Social work is a field that relies heavily on practical skills, clinical experience, and interpersonal abilities, and we believe that fieldwork and degree completion are indicators of a social worker's ability, rather than standardized testing.

By removing unnecessary hurdles to licensure, we can help more qualified individuals enter the profession, and increase the number of social workers available to serve vulnerable populations in need of mental health services and support programs.

For these reasons, we urge a favorable report on SB379.

Kathryn S. Farinholt  
Executive Director  
National Alliance on Mental Illness, Maryland

**Contact:** Morgan Mills  
Compass Government Relations  
Mmills@compassadvocacy.com

# **MH\_Testimony.pdf**

Uploaded by: Michael Hrabec

Position: FAV

Dear Members of the Senate Finance Committee,

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence, but are inherent in the design of standardized testing, which has consistent bias against already marginalized groups.

In response to the data release, Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October, 2023. They have been meeting monthly and heard from a diverse array of perspectives, including two presentations by ASWB, a nursing exam expert, and the Director of NASW-Illinois, who reviewed the effects of licensure reform efforts in that state. The workgroup determined that removing the exam at the Bachelors (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.

We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

Repeating a statement over and over again does not make it true. ASWB has had 40 years to provide proof that their exams are correlated with safe and effective social work practice, and it has not done so. ASWB only released pass rate data under incredible pressure, as it proved what social workers have colloquially known for years. Much as ASWB would like to convince you otherwise,

there simply is no true way to objectively measure social work competence. Social work is a highly person-centered profession, people are not standardized, and impossible-to-measure skills such as empathy are of ultimate importance to the field of social work. Research indicates that standardized tests are often culturally biased, relying on knowledge and reasoning shaped by dominant cultural norms. Differing knowledge and ways of thinking are a core strength of social work, but our licensing exams treat them as liabilities to be weeded out.

Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

In addition to not providing any type of measurement of social work skill, ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels. There is no evidence that lack of exams or exam removal have brought harm to the public. Because Illinois has some of the most easily accessible data and a slightly longer period of Masters level exam removal, they were studied in more detail in the Workgroup [final report](#) (page 36-37). Exam removal has had zero effect on the number of sanctions in that state.

Our BSWE is a member of the ASWB. It was one of few organizations afforded two seats on the Social Work Licensing Workgroup. Unfortunately, BSWE's allegiances are unclear and potentially problematic for a Maryland-based board. They consistently sided with ASWB's financial interests rather than centering the interests of Marylanders who are in desperate need of culturally responsive social work services. I applaud this legislation for increasing oversight by adding consumer members.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our

behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,

Mchael Hraber

District 17

**Massey\_SB379.pdf**

Uploaded by: Michael Massey

Position: FAV

**Michael Massey, PhD, MSW, M.Ed., Assistant Professor, Catholic University of America**

**SB0379: State Board of Social Work Examiners - Membership and Examination  
Requirements  
Position: Favorable**

Dear Chair Beidle, Vice Chair Hayes, and members of the Senate Finance Committee,

My name is Michael Massey and I am a resident of District 18 and am a Professor of Social Work at Catholic University (my testimony reflects my personal views). I am writing to request that you find a favorable report for SB379. Two years ago, you helped pass legislation to convene a workgroup of diverse voices within social work to study the issue of social work licensure and make recommendations. After careful consideration of the evidence, they submitted their report. Following the Workgroup's recommendations, SB379 will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members and it will safely add qualified social workers to the workforce, which both helps address our mental health workforce shortage and contributes to a more robust Maryland economy.

**Increasing and Diversifying our Workforce: Good for Mental and Economic Health**

Right now, licensure exam requirements are keeping thousands of qualified and ready social workers from serving their communities. We know this because the organization who creates and administers the national exam, the Association of Social Work Boards (ASWB), finally—after 40 years of testing—released demographic exam outcome data. The results were worse than we thought—there are huge racial and other disparities that have allowed most white social work graduates to enter the field and left many social workers of Color out in the cold. From 2011-2021, white test-takers in Maryland passed the Masters level exam at a first-time rate of 93%, while Black test-takers passed at 56% rate and Hispanic/Latinos at a 79% rate. Clinical exam pass rates are similar, with rates of 89%, 54%, and 66% respectively. We've done the math. If all exam-takers in Maryland passed at the white pass rates during 2011-2021, we would have over 1200 more licensed social workers. Increasing and diversifying our social work workforce would be an incredible boon for the citizens of Maryland and the state's overall economic, mental, and physical health.

**Following the Evidence: SB379 is an Evidence-Based, Commonsense Policy**

As a committed and responsible lawmaker, I am certain that you want to pass legislation that is rooted in solid evidence. Fortunately, if you look at the existing evidence (and where evidence is lacking), you will find that SB379 is overwhelmingly evidence-based. Here is a summary:

**What the Evidence Says:**

- **Passing SB379 would immediately add more qualified social workers to the Maryland workforce.** Other states that have passed similar measures have seen huge increases in licensed social workers. Illinois removed the exam requirement for the LSW (LMSW in MD)

license in 2021, and added nearly 5000 LSWs by the end of 2023, nearly doubling the workforce at that level. Rhode Island did the same in 2022 and more than doubled their number of LCSWs (LMSW in MD) from 2021 to 2022. In Connecticut, total Masters level licensed social workers went from 3812 in 2022 to 5104 in 2023 (bill was passed in mid-2023), a 34% increase.

- **Passing SB379 poses no risk to the public.** I collected publicly available data on social work disciplinary sanctions in Illinois, Rhode Island, and Connecticut to see if eliminating the exams may contribute to more discipline or ethical violations. The answer is definitively, “No.”
  - In Illinois, approximately .04% of LSWs were sanctioned in the three years before the masters exam was eliminated compared to only .08% in the years after, meaning there was no substantive increase in disciplinary sanctions. Importantly, the very small increase in sanctions after the policy enactment was not caused by social workers who did not take the exam, since all of the sanctioned social workers were licensed before the bill went into effect.
  - In Rhode Island, there have been only two total disciplinary sanctions since law went into effect in 2022.
  - In Connecticut, in the 2.5 years since the law was passed, there were 7 total disciplinary hearings for Masters level licensees, compared to 4 in the 2.5 years prior to the bill. Given the increase in numbers of licensees, this represents a near 0% increase.
- **The enormous racial and other disparities found in the exam outcome data indicate substantial bias, keeping large numbers of qualified social workers from going to work for Maryland citizens.** [Even research that the ASWB recently sponsored](#) found that exam results are likely impacted by factors other than social work competence, indicating what is called construct-irrelevant variance, which threatens exam validity. [Other research](#) has conclusively shown that ASWB doesn't follow the psychometric standards that they claim to. The National Association of Social Workers, our most prominent national professional organization, stated in October 2022, “The current exam does not conform with industry testing standards. Further, there is no evidence that the exam ensures competence or prevents misconduct or unethical practice. We cannot support exam requirements that result in unnecessary gatekeeping and discrimination.” This could not be any clearer.
- **Research suggests that the social work exams are not valid indicators of social work competence.** [Research](#) going back to the 1980s has raised questions about the exam's validity. In 1994, [Randall and Thyer](#) released a study using practice clinical exams that demonstrated huge validity problems. 16 years later, [Albright & Thyer](#) conducted a similar study on new exams and found the same issues! [Recent research](#) has found racial and other microaggressions embedded in test questions. In a 2022 [white paper](#) that examines clinical exams for Psychology, Clinical Social Work, Counseling, and Marriage and Family Counseling, Caldwell and Rousmaniere, found that “After more than 50 years of use, there remains no evidence that clinical exams in mental health care improve the quality or safety of that care.” Most recently, [Victor and colleagues](#) used artificial intelligence to answer exam questions and found major problems related to construct validity. Among many interesting



findings was that, for several questions, the AI technology was able to generate reasoned and convincing arguments as to why the answer considered “correct” by ASWB was not the best answer.

### **What the Evidence Does Not Say:**

- **There is no evidence that the social work Masters and Bachelors exams have any relationship to social work competence or safe practice.** In over forty years of testing, neither ASWB nor anyone else has provided evidence that passing the exam has any relationship to better or more ethical practice. When I contacted ASWB about this, they sent me a link to their website, which offers no evidence of the kind. It makes no sense to continue to require an exam that is so clearly biased and appears to be doing nothing.
- **There is no evidence that eliminating the exam requirement at the Bachelors and Masters levels leads to a “two-tiered” licensing system.** No states that have passed similar laws have experience this issue. In fact, when [Joel Ruben, Executive Director of NASW's Illinois chapter](#) presented to the workgroup, he was asked if licensed social workers who didn't take the exam are seen as “less than” in the practice community. He answered, quite succinctly, “No, I don't. A license is a license” (1:09:10). In fact, Maryland still has practicing social workers who were grandfathered into licensure without taking the exam and they have had long, successful careers.

As a social work professor at Catholic University, I have seen excellent students graduate and immediately stagnate as they are denied jobs that they are qualified for. They put in the work and demonstrated time and again that they are ready to do the difficult and nuanced work that the job demands. Many of these students, who are mostly Black, want to go back to their own communities and serve people with whom they share background and culture. Yet, an exam that is unsupported by evidence keeps them from doing so. And we all are lesser for it. I urge you to return a favorable vote on SB379 and put more social workers to work. It is a sensible investment in Maryland's mental and economic health.

# Written Testimony for SB379 (1).pdf

Uploaded by: Philicia Ross

Position: FAV

**Dear Members of the Senate Finance Committee,**

My name is **Philicia Ross**, and I am the **NAACP Appointee to the Maryland Workgroup on Social Work Licensure Requirements**. I am urging you to vote FAVORABLE on SB379. I have firsthand knowledge of the workgroup's findings and recommendations. I started as an **LMSW** when this workgroup convened and became a **Licensed Clinical Social Worker-Certified (LCSW-C) in December 2023**. In April 2024, I opened my private practice, **Village of Sound Mind**, focusing on **Women of Color, Queer folx, and individuals living with invisible and chronic illnesses**—communities that are vastly underrepresented in mental health care. By **November 2024, my practice was full**, and I had **no one to refer new clients to** who met their needs for representation due to colleagues also being full or simply not existing.

This reality **isn't just about numbers—it's about impact**.

- When a **Black woman survivor of domestic violence** cannot find a provider who understands the cultural nuances of her experience, she **stays in crisis longer** or does not receive services at all.
- When a **queer young adult** seeking gender-affirming mental health support encounters a provider unfamiliar with their needs, they are forced to **educate the professional who is supposed to help them**.
- When someone with a **chronic illness like sickle cell disease or fibromyalgia** struggles to access a therapist who understands their **intersection of physical and mental health needs**, they go without.

This is the direct result of **barriers in social work licensure that prevent diverse, competent social workers from entering the field**. The **ASWB exam is the greatest of these barriers**.

While the committee has heard about the disparities in test outcomes, I want to bring a **new perspective**:

- **The ASWB exam was never designed to measure clinical readiness**. Unlike other professional licensing exams, it does not assess applied skills or real-world decision-making. The ASWB itself **has never provided evidence** that its exam is correlated with effective social work practice.
- **Maryland has already determined that we have a behavioral health crisis**. The 2024 report from the Maryland Health Care Commission states that we need **32,800 more behavioral health workers by 2028**, yet we continue to uphold barriers that **actively prevent** trained social workers from entering the field.
- **Social work licensure already requires rigorous training**. Every MSW graduate completes at least **900 hours of supervised practice**, plus additional clinical supervision for those seeking advanced licensure. The idea that removing this exam would create an unqualified workforce is simply untrue.

**Removing the Exam Is Not Lowering the Bar—It's Removing a Barrier**

Opponents of this bill claim that removing the ASWB exam will lower standards for social work. That is **not true**. The workgroup's recommendation is not about lowering the bar—it's about **replacing an ineffective and inequitable tool** with a **more rigorous, experience-based assessment**.

The workgroup recommends:

1. **Issuing LBSW and LMSW licenses based on education and supervised fieldwork, not an exam.**
2. **Creating an alternative pathway for LCSW-Cs that emphasizes clinical hours and mentorship rather than a multiple-choice test.**
3. **Investing in a workforce pipeline that prioritizes lived experience, cultural competency, and real-world readiness over standardized testing.**

This does **not** create a two-tiered system—the **two-tiered system already exists** because of the ASWB exam. The test has veto power over whether a trained professional, who has already completed years of education and hands-on experience, can serve their community.

### **Maryland Must Lead**

States like **Illinois, Minnesota, and Connecticut** have already reduced their reliance on licensing exams, with **no evidence of harm to public safety**. Maryland should be **at the forefront** of this reform, not trailing behind.

Passing **SB379** will do more than improve equity—it will:

- **Strengthen Maryland's social work workforce** in schools, hospitals, and community clinics.
- **Reduce the state's reliance on costly crisis interventions** by ensuring that people can access preventative care sooner.
- **Increase financial stability for new social workers** by eliminating unnecessary exam fees and repeated testing cycles.

The ASWB exam does **not** make social work better. **It makes it less accessible**. It is time for Maryland to lead in fixing this broken system.

I urge you to **pass SB379** and help us build a **stronger, more representative, and more effective social work profession**.

**Thank you for your time and consideration.**

**Respectfully,**

*Philicia Ross, LCSW-C*

NAACP Appointee, Workgroup on Social Work Licensure Requirements

Licensed Clinical Social Worker Certified & PRP Manager at A Village Wellness Center

# **SB379\_UM SWASC\_FAV**

Uploaded by: Psalms Thomas

Position: FAV

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## TESTIMONY IN SUPPORT OF SENATE BILL 379

### State Board of Social Work Examiners - Membership and Examination Requirements

#### *Finance Committee*

February 4, 2025

**Social Work Advocates for Social Change strongly supports SB 379**, which will repeal the examination requirements for bachelor and master social worker licenses, and add two consumer members to the State Board of Social Work Examiners. This legislation would help address the growing need for social workers by removing unnecessary barriers, and make the social work profession more accessible to individuals from diverse backgrounds and experiences.

**There is no evidence the social work licensing exams assess competency or safety.**<sup>1</sup>

The racial and other disparities in licensure exam passage rates, obviously, are not indicative of the lack of competency or safety among groups with lower passage rates; else groups that pass at lower rates would have to be less competent or less safe. In Maryland, disparities are evident when comparing the pass rates of students from Predominantly White Institutions (PWIs) and Historically Black Colleges and Universities (HBCUs) on the LMSW exam. As of 2023, the University of Maryland, Baltimore, School of Social Work (UMSSW) excels with a 79.8% first-time pass rate, while Morgan State University, an HBCU, has a significantly lower first-time pass rate at 31.6%.<sup>2</sup> We cannot believe that the students of PWIs are more than twice as competent or safe at serving the needs of Baltimore's residents and communities than the students of HBCUs. In states that have removed the licensure exam requirement – such as Illinois, Rhode Island, and Connecticut – there has been no statistically significant increase in disciplinary actions. **There is, however, ample evidence of the harm caused by the exams – both on those who repeatedly fail the exams and on those whose needs they might be serving.**<sup>3</sup>

**The examination perpetuates inequality and is a barrier to a diverse, knowledgeable workforce that is representative of the Marylanders served by social workers.** The inequities in exam passage rates mean that organizations and providers struggle to hire social workers who share the same histories and identities as the families and individuals they serve, which is a massive disservice to individuals who seek care, to marginalized communities, and to our state overall. For instance, 12% of Maryland's

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<sup>1</sup> Caldwell, B.E. & Rousmaniere, T. (2022). Clinical licensing exams in mental health care.

<https://www.psychotherapynotes.com/wp-content/uploads/2022/10/Clinical-Licensing-Exams-in-Mental-Health-Care-October-2022.pdf>.

<sup>2</sup> Association of Social Work Boards. (2023). Exam pass rates.

<https://www.aswb.org/exam/exam-scoring/exam-pass-rates/>.

<sup>3</sup> Castex, G., Senreich, E., Phillips, N. K., Miller, C. M., & Mazza, C. (2019). Microaggressions and racial privilege within the social work profession: The social work licensing examinations. *Journal of Ethnic & Cultural Diversity in Social Work*, 28(2), 211-228. <https://www.tandfonline.com/doi/abs/10.1080/15313204.2018.1555498>.

population identifies as Hispanic or Latine, but every county in the state has a massive shortfall of Spanish-speaking social workers, and the disparities in exam passage for test takers whose first language isn't English exacerbate this unmet need.<sup>4</sup>

**Reducing barriers to licensure will grow the behavioral health workforce.** Maryland is facing a significant shortage of behavioral health professionals as 18,200 more workers are needed just to meet today's demand. By 2028, Maryland needs to double the current size of the state's behavioral health workforce.<sup>5</sup> Removing the licensing exam would allow for more MSW graduates to enter into the behavioral health workforce pipeline with an LMSW, where they will practice under the license and guidance of an LCSW or LCSW-C who is a licensed supervisor in the state. This will help to alleviate the pressure of the workforce shortfall, like in Montgomery County Public Schools (MCPS), where the district is unable to hire more social workers due to the lack of available licensed professionals.<sup>6</sup>

**SB 379 will help alleviate the financial strain on low-income individuals seeking to enter the social work profession.** The costs associated with obtaining licensure can be prohibitively expensive, especially for students managing fieldwork, coursework, and the pressures of daily life. By reducing financial and structural barriers like exam fees, which some people have to pay over and over again, SB 379 makes obtaining licensure more accessible to individuals with financial hardship. While schools like the UMSSW are trying to overcome this challenge through programs like the new *Bridging Success Scholarship*,<sup>7</sup> which covers the \$100 LMSW registration fee for some students, such programmatic interventions do not address the policy problem. Only the Maryland General Assembly can do this. You recognized these disparities and shortages, as well as the need for reform, when you established a workgroup to assess and address these problems, and **the Social Work Licensure Workgroup, which has met since 2023, overwhelmingly recommended the provisions in SB 379. Social Work Advocates for Social Change strongly encourages the Committee to follow the recommendations of the Workgroup and urges a favorable report on SB 379.**

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*Social Work Advocates for Social Change is a coalition of MSW students at the University of Maryland School of Social Work that seeks to promote equity and justice through public policy, and to engage the communities impacted by public policy in the policymaking process.*

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<sup>4</sup> Maryland Health Care Commission. October 2024. *Investing in Maryland's Behavioral Health Talent*. [https://marylandmatters.org/wp-content/uploads/2024/11/Full-Report\\_Maryland-BH-Workforce-Assessment-Final-Oct-2024.pdf](https://marylandmatters.org/wp-content/uploads/2024/11/Full-Report_Maryland-BH-Workforce-Assessment-Final-Oct-2024.pdf)

<sup>5</sup> Ibid

<sup>6</sup> The MoCo Student. (October 27, 2023). *Strain in MCPS mental health resources from shortages of social workers*. The MoCo Student. <https://mocostudent.org/2023/10/strain-in-mcps-mental-health-resources-from-shortages-of-social-workers/>

<sup>7</sup> University of Maryland School of Social Work (Jan 27, 2025). The Elm. <https://elm.umaryland.edu/announcements/2025/The-Bridging-Success-Scholarship-Launched.php>

# **Rachel Doyle testimony 1.31.25.pdf**

Uploaded by: Rachel Doyle

Position: FAV



Dear Chair Beidle and Members of the Senate Finance Committee,

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence, but are inherent in the design of standardized testing, which has consistent bias against already marginalized groups.

In response to the data release, Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October, 2023. They have been meeting monthly and heard from a diverse array of perspectives, including two presentations by ASWB, a nursing exam expert, and the Director of NASW-Illinois, who reviewed the effects of licensure reform efforts in that state. The workgroup determined that removing the exam at the Bachelors (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.

We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

Repeating a statement over and over again does not make it true. ASWB has had 40 years to provide proof that their exams are correlated with safe and effective social work practice, and it has not done so. ASWB only released pass rate data under incredible pressure, as it proved what social workers have colloquially known for years. Much as ASWB would like to convince you otherwise, there simply is no true way to objectively measure social work competence. Social work is a highly person-centered profession, people are not standardized, and impossible-to-measure skills such as empathy are of ultimate importance to the field of social work. Research indicates that standardized tests are often culturally biased, relying on knowledge and reasoning shaped by dominant cultural norms. Differing knowledge and ways of thinking are a core strength of social work, but our licensing exams treat them as liabilities to be weeded out.

Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

In addition to not providing any type of measurement of social work skill, ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels. There is no evidence that lack of exams or exam removal have brought harm to the public. Because Illinois has some of the most easily accessible data and a slightly longer period of Masters level exam removal, they were studied in more detail in the Workgroup [final report](#) (page 36-37). Exam removal has had zero effect on the number of sanctions in that state.

Our BSWE is a member of the ASWB. It was one of few organizations afforded two seats on the Social Work Licensing Workgroup. Unfortunately, BSWE's allegiances are unclear and potentially problematic for a Maryland-based board. They consistently sided with ASWB's financial interests rather than centering the interests of Marylanders who are in desperate

need of culturally responsive social work services. I applaud this legislation for increasing oversight by adding consumer members.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to keep up with our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,  
Rachel Doyle, LICSW  
District 21

# Written Testimony for SB379.pdf

Uploaded by: Rebecca Davis

Position: FAV

Dear Members of the Senate Finance Committee,

As a social work educator, administrator for a school of social work and advocate for the future of our diverse mental health workforce, I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence, but are inherent in the design of standardized testing, which has consistent bias against already marginalized groups.

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We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

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Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

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Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,  
Becky Davis, MSW  
Maryland Legislative District 21  
Maryland Congressional District 5

**Ferm\_SB379\_favorable.pdf**

Uploaded by: Rebecca Ferm

Position: FAV

Dear Members of the Senate Finance Committee,

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

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Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,  
Rebecca Ferm, LCSW-C  
Maryland Legislative District

# **SB0379 Fuld.pdf**

Uploaded by: Samantha Fuld

Position: FAV

January 21, 2025

**To:** Members of the Senate Finance Committee

**From:** Dr. Samantha Fuld, DSW, MSW, LCSW-C, Clinical Assistant Professor, University of Maryland School of Social Work

**Re:** SB0379 State Board of Social Work Examiners - Membership and Examination Requirements

**Position: Favorable**

I am a Clinical Assistant Professor at the University of Maryland School of Social Work and a proud resident of Maryland (District 46). In this testimony I am speaking as an individual and NOT on behalf of my employer. However, I do have experience teaching hundreds of MSW students who are preparing for licensure and service as social workers in Maryland.

ASWB exam data released in August 2022, and what we know overwhelmingly about standardized testing (which has in recent years led some universities to drop standardized testing requirements as part of admissions criteria), demonstrates that the licensing exams required to enter the social work profession disproportionately keep people who are marginalized based on race, native language, disability, etc. from entering the profession. This is at a time when social workers are needed more than ever, particularly social workers whose identities represent those who are receiving services in the community. This is harmful to those individuals who must spend additional money and time re-taking the exam or shifting their professional aspirations and who experience numerous unjust disadvantages due to systemic bias. It is also harmful to Marylanders who need critical clinical services provided by licensed social workers.

Based on this data, several other states have already moved toward a licensing model that does not require standardized testing as a basis or requirement for licensing. As someone deeply involved in MSW education in Maryland, I urge you to vote favorably on this bill so our state can move in this direction as well. Our MSW and BSW programs must adhere to rigorous [Educational Policy and Accreditation Standards](#) put forth by the Council on Social Work Education. Students are assessed for core competencies across the curriculum as well as in internships that require real-world experiential learning in community-based social work contexts. The skills needed for competent and effective social work practice are relational and truly cannot be measured through a standardized test. Successfully obtaining a MSW or BSW degree from an accredited institution should assure the state that a social worker is qualified for licensure.

As an instructor, in the past several years I have adjusted my exams and assessments to favor a more narrative approach that is not time-limited. The reason I've done this is that it was clear to

me that exceptional students, who I know from their engagement in class exercises, activities, and experiential learning are highly competent future social workers, don't always "test" well. Performance on a timed multiple-choice test cannot capture relevant skills for engagement, assessment, treatment planning, practice interventions, and evaluation. I've adjusted my assessment strategies to better account for this and I hope that the state will too.

Additionally, please remember that a private company, [PSI](#), profits from the administration of social work licensing exams and thus has a financial stake in maintaining them and trying to convince both social workers and legislators of their importance.

I do understand that there is concern amongst some that removing testing as a requirement for licensure would diminish the reputation of new licensees in comparison to those who were required to pass the test. The data has been clear - this test is not measuring competence. We should not stall progress for fear of unreasonable social hierarchies and biases. It will be our job as a profession to ensure that the community, organizations, and previously licensed social workers understand the need for this change and rightly value the educational credentials of a BSW or MSW in their own right.

I urge you to vote favorably on SB0379 and ensure that a biased test is no longer able to prevent qualified MSWs and BSWs from obtaining licensure in Maryland.

Respectfully,

Dr. Samantha Fuld, DSW, MSW, LCSW-C

*Samantha Fuld*

**Copy of SB379 Letter1.29.25.pdf**

Uploaded by: Tarahn Harris

Position: FAV

February 4, 2025

RE: Support for SB379 | State Board of Social Work Examiners-Membership and Examination Requirements.

Commented [1]: SB379 or SB0379

**Position: Favorable**

My name is Tarahn Harris. I am a graduate of the University of Maryland School of Social Work, class of 2005. I wholeheartedly support SB379 in its current form. This bill repeals the examination requirements for bachelor and master level licenses, which aligns with recommendations of Maryland's Workgroup on Social Workers requirement for Licensure. The work group was made up of competent professionals who provided insight into the harm that the licensing exam has caused. As a person who has been directly impacted by the licensing exam, I can tell that the exam is culturally and ethnically biased. The current structure of the licensing exam does not measure competency as it relates to direct Social Work practice.

The Workgroup has taken the time and effort required by the Senate committee to identify alternative pathways to the current structure of the licensing requirements. The data shows that there is a shortage of competent available social workers to provide services to various populations. A major part of this shortage is a direct result of there not being enough licensed social workers. Maryland must open the door for more social workers to become licensed and be able to provide services.

After graduating from UMD I studied and prepared for the Social Work License Exam with former classmates and peers. While preparing and studying for the exam, one of the resounding memories I have is that I was encouraged to answer questions on the exam as if I was a white person - that was going to be my best chance of passing the exam. After 3 attempts from 2005-2010 I was unable to pass the licensing exam despite months of preparation and studying. This caused a significant strain on my self-confidence and ability to believe that I had the necessary skills to be an impactful social worker. The times that I took the exam and failed, I failed by 2 or 3 points. The financial strain from the exam fee and the costs of study guides and courses were also challenging and discouraged me from attempting to take the exam moving forward.

With my inability to pass the licensure exam, I was limited to what I could do for my Social Work career. For 5-7 years I was required to practice Social Work under a Licensed Social Worker, capping my salary and career trajectory despite my increasing experience and expertise. Eventually, I was forced to walk away from the clinical side of Social Work as a direct result of not having my license. The exam is biased, often utilizing racial stereotypes and microaggressions within the questions, as well as the questions often displaying poor social work practice. The ASWB has had 40 years to remove bias from its exams, has not done so, and even continues to state that their exams are not biased. Removing this barrier will be helpful in opening the door for more eligible social workers.

Thank you for your time and consideration of this urgent matter.

Tarahn Harris, MSW  
University of Maryland School of Social Work class of 2005

**SB379 .pdf**

Uploaded by: Tatyana Hodges

Position: FAV

Dear Members of the Senate Finance Committee,

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As a social work student, it is important to me that my future workforce reflects the diversity of the communities that we serve in Maryland and the diversity of students that are a part of my social work program. Maryland's own [Behavioral Health Workforce Assessment](#) shows that MSW graduation rates are declining and that 70% of my cohort will not be serving Marylanders in a social work capacity within one year of graduation. While this is not fully explained by ASWB exams, it is at least partially explained by it. This number also reflects my BIPOC, older, multilingual, and deaf colleagues who will avoid jobs that require licensure because they do not want to take exams that are stacked against them. Removing an exam that stops careers before they even begin can make social work a more attractive profession, increasing enrollment in MSW programs.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Sincerely,  
Tatyana J. Hodges, BSW 2024  
MSW Class of 2025  
District 6

**SB379\_MARFY\_FAV.pdf**

Uploaded by: Therese Hessler

Position: FAV



**February 4, 2025**

**Senate Bill 379 - State Board of Social Work Examiners - Membership and Examination Requirements**

**Senate Finance Committee**

**Position: SUPPORT**

The Maryland Association of Resources for Families and Youth (MARFY) is an association of private child caring organizations providing foster care, group homes, and other services through more than 200 programs across Maryland. The members of MARFY represent providers who serve Maryland's most vulnerable children who are in out of home placements due to abuse, neglect or severe mental health, and medical needs. We operate group homes, treatment foster care programs and independent living programs, primarily serving the adoptive and foster care population as well as a juvenile services population.

We strongly support Senate Bill 379 which seeks to expand pathways to becoming a licensed social worker in Maryland. Specifically, this legislation would remove the exam requirement for individuals seeking licensure at the Bachelors (LBSW) and Masters (LMSW) level licensure, addressing critical workforce shortages and improving equity in employment opportunities within this essential profession.

Maryland, like many states, is facing an acute shortage of social workers. The demand for qualified professionals to support our communities, particularly in areas of mental health, child welfare, and crisis intervention, continues to grow. However, the current licensure exam requirement has proven to be a significant barrier for many qualified individuals, limiting the pool of available social workers. Removing this exam requirement will allow well-trained individuals to enter the workforce more efficiently, filling critical gaps in services and ensuring Maryland residents receive the care and support they need.

Removing the exam requirement will not only diversify the social work profession but also strengthen culturally competent care. Individuals who come from the communities they serve bring invaluable lived experiences and insights that enhance the effectiveness of social work interventions. Expanding pathways to licensure ensures that our workforce better reflects the populations they serve, leading to improved trust, engagement, and outcomes for historically marginalized communities.

It is also extremely important that Maryland advocates for these alternate pathways to be recognized and supported if SB174 - Interstate Social Work Licensure Compact is passed.

We want to ensure that when these alternative pathways to licensure requirements become recognized in Maryland, that this does not bar Marylanders who have taken these additional pathways to licensure from being eligible for a multistate license under the compact. It is our hope that Maryland continues to advocate for smart changes that allow individuals to grow and thrive in the field of social work and the populations they serve.

By passing this legislation, Maryland can take a bold and necessary step toward strengthening its social work workforce, promoting equity in employment, and ensuring high-quality care for all residents. We ask this Committee and the General Assembly to support this bill and remove unnecessary barriers that prevent qualified individuals from entering the profession. Thank you for your time and consideration.

**For more information call or email:**

Therese M. Hessler | 301-503-2576 | [therese@ashlargr.com](mailto:therese@ashlargr.com)

**SWASC SB 379 - FAV.pdf**

Uploaded by: UM SWASC

Position: FAV

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**TESTIMONY IN SUPPORT OF SENATE BILL 379**  
**State Board of Social Work Examiners - Membership and Examination Requirements**  
*Finance Committee*  
**February 4, 2025**

**Social Work Advocates for Social Change strongly supports SB 379**, which will repeal the examination requirements for bachelor and master social worker licenses, and add two consumer members to the State Board of Social Work Examiners. This legislation would help address the growing need for social workers by removing unnecessary barriers, and make the social work profession more accessible to individuals from diverse backgrounds and experiences.

**There is no evidence the social work licensing exams assess competency or safety.<sup>1</sup>**

The racial and other disparities in licensure exam passage rates, obviously, are not indicative of the lack of competency or safety among groups with lower passage rates; else groups that pass at lower rates would have to be less competent or less safe. In Maryland, disparities are evident when comparing the pass rates of students from Predominantly White Institutions (PWIs) and Historically Black Colleges and Universities (HBCUs) on the LMSW exam. As of 2023, the University of Maryland, Baltimore, School of Social Work (UMSSW) excels with a 79.8% first-time pass rate, while Morgan State University, an HBCU, has a significantly lower first-time pass rate at 31.6%.<sup>2</sup> We cannot believe that the students of PWIs are more than twice as competent or safe at serving the needs of Baltimore's residents and communities than the students of HBCUs. In states that have removed the licensure exam requirement – such as Illinois, Rhode Island, and Connecticut – there has been no statistically significant increase in disciplinary actions. **There is, however, ample evidence of the harm caused by the exams – both on those who repeatedly fail the exams and on those whose needs they might be serving.<sup>3</sup>**

**The examination perpetuates inequality and is a barrier to a diverse, knowledgeable workforce that is representative of the Marylanders served by social workers.** The inequities in exam passage rates mean that organizations and providers struggle to hire social workers who share the same histories and identities as the families and individuals they serve, which is a massive disservice to individuals who seek care, to marginalized communities, and to our state overall. For instance, 12% of Maryland's

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<sup>1</sup> Caldwell, B.E. & Rousmaniere, T. (2022). Clinical licensing exams in mental health care. <https://www.psychotherapynotes.com/wp-content/uploads/2022/10/Clinical-Licensing-Exams-in-Mental-Health-Care-October-2022.pdf>.

<sup>2</sup> Association of Social Work Boards. (2023). Exam pass rates. <https://www.aswb.org/exam/exam-scoring/exam-pass-rates/>.

<sup>3</sup> Castex, G., Senreich, E., Phillips, N. K., Miller, C. M., & Mazza, C. (2019). Microaggressions and racial privilege within the social work profession: The social work licensing examinations. *Journal of Ethnic & Cultural Diversity in Social Work*, 28(2), 211-228. <https://www.tandfonline.com/doi/abs/10.1080/15313204.2018.1555498>.

population identifies as Hispanic or Latine, but every county in the state has a massive shortfall of Spanish-speaking social workers, and the disparities in exam passage for test takers whose first language isn't English exacerbate this unmet need.<sup>4</sup>

**Reducing barriers to licensure will grow the behavioral health workforce.** Maryland is facing a significant shortage of behavioral health professionals as 18,200 more workers are needed just to meet today's demand. By 2028, Maryland needs to double the current size of the state's behavioral health workforce.<sup>5</sup> Removing the licensing exam would allow for more MSW graduates to enter into the behavioral health workforce pipeline with an LMSW, where they will practice under the license and guidance of an LCSW or LCSW-C who is a licensed supervisor in the state. This will help to alleviate the pressure of the workforce shortfall, like in Montgomery County Public Schools (MCPS), where the district is unable to hire more social workers due to the lack of available licensed professionals.<sup>6</sup>

**SB 379 will help alleviate the financial strain on low-income individuals seeking to enter the social work profession.** The costs associated with obtaining licensure can be prohibitively expensive, especially for students managing fieldwork, coursework, and the pressures of daily life. By reducing financial and structural barriers like exam fees, which some people have to pay over and over again, SB 379 makes obtaining licensure more accessible to individuals with financial hardship. While schools like the UMSSW are trying to overcome this challenge through programs like the new *Bridging Success Scholarship*,<sup>7</sup> which covers the \$100 LMSW registration fee for some students, such programmatic interventions do not address the policy problem. Only the Maryland General Assembly can do this. You recognized these disparities and shortages, as well as the need for reform, when you established a workgroup to assess and address these problems, and **the Social Work Licensure Workgroup, which has met since 2023, overwhelmingly recommended the provisions in SB 379. Social Work Advocates for Social Change strongly encourages the Committee to follow the recommendations of the Workgroup and urges a favorable report on SB 379.**

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*Social Work Advocates for Social Change is a coalition of MSW students at the University of Maryland School of Social Work that seeks to promote equity and justice through public policy, and to engage the communities impacted by public policy in the policymaking process.*

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<sup>4</sup> Maryland Health Care Commission. October 2024. *Investing in Maryland's Behavioral Health Talent*. [https://marylandmatters.org/wp-content/uploads/2024/11/Full-Report\\_Maryland-BH-Workforce-Assessment-Final-Oct-2024.pdf](https://marylandmatters.org/wp-content/uploads/2024/11/Full-Report_Maryland-BH-Workforce-Assessment-Final-Oct-2024.pdf)

<sup>5</sup> Ibid

<sup>6</sup> The MoCo Student. (October 27, 2023). *Strain in MCPS mental health resources from shortages of social workers*. The MoCo Student. <https://mocostudent.org/2023/10/strain-in-mcps-mental-health-resources-from-shortages-of-social-workers/>

<sup>7</sup> University of Maryland School of Social Work (Jan 27, 2025). The Elm. <https://elm.umaryland.edu/announcements/2025/The-Bridging-Success-Scholarship-Launched.php>

**SB379 SWEAR.pdf**

Uploaded by: Veronica Cosby

Position: FAV



**To: State Board of Social Work Examiners - Membership and Examination Requirements**  
**Re: SB0379**

From: Veronica Cosby, MSM, MSW  
11018 Arizona Ave NW  
Cumberland, MD 21502  
765-993-8565

**Testimony:**

My testimony is that I am a 59-year-old African American who graduated from Indiana Wesleyan University on 12/19, just before the pandemic. Due to the COVID testing restrictions, I could not test for a year. I eventually tested for the first time at the end of 2020. Since then, I have spent \$3220 @ \$230 on each test and have tested fourteen times. I have lost track of how much I have spent on testing materials. I have over 14 years of social work experience ranging from CPS to psychiatric care. I am now a school social worker, pending my passing the LMSW exam. I love my job, but we struggle to keep good credentialed staff due to low state wages. I am prepared to sit for my LMSW ASWB exam **on February 18th at 8:00 AM** for fifteen time. If I pass, I will have a job. If not, I will be desperately looking for employment. I work in a high-poverty demographic area, and things are only going to get worse in these coming years. I need to be licensed to pursue my LCSW-C, which means I need an additional 3000 supervision hours. Thus, waiting another two years.

Please consider that I love working with and serving underrepresented populations.

In his hands,  
Veronica Cosby MSM, MSW  
Romans 8:28

**V.R SB379 Written Testimony-2025.pdf**

Uploaded by: Victoria Rodriguez

Position: FAV

Dear Members of the Senate Finance Committee,

I am writing to request that you codify workgroup recommendations and **find a favorable report for SB379**. This bill will increase accountability to the Board of Social Work Examiners (BSWE) by adding two more consumer members, and it will also create a more equitable path to social work without sacrificing social work competence.

In 2022, the Association of Social Work Boards (ASWB) released [data](#) that shows alarming disparities in pass rates of social work licensing exams. These disparities demonstrate lower pass rates in BIPOC, older, and multilingual social workers. According to ASWB's own data, first-time pass rates for white candidates are around **84%**, compared to **45%** for Black candidates and **64%** for Hispanic candidates. Additionally, pass rates go down as test taker age goes up. We know these disparities are not due to competence, but are inherent in the design of standardized testing, which has consistent bias against already marginalized groups.

In response to the data release, Maryland legislature passed a social work licensing workgroup in 2023, and it was signed into law. The workgroup started meeting in October, 2023. They have been meeting monthly and heard from a diverse array of perspectives, including two presentations by ASWB, a nursing exam expert, and the Director of NASW-Illinois, who reviewed the effects of licensure reform efforts in that state. The workgroup determined that removing the exam at the Bachelors (LBSW) and Masters (LMSW) levels is the best way to move forward for our state.

We also know that standardized testing bias means that marginalized communities are deprived of representation in social work. Dedicated Maryland social workers who would like to serve their communities face only one barrier that has the ultimate veto power in their ability to work - an exam that is demonstrably biased. Based on ASWB data from 2011-2021, Maryland would have an additional [1227](#) licensed social workers if every demographic group passed at the same rate as white social workers. Imagine what an impact these social workers could make on our underserved communities if they were able to practice! LBSWs and LMSWs are usually the ones doing the incredibly important but unglamorous direct care work in hospitals, community mental health centers, and foster care agencies. A more diverse workforce enhances cultural humility and demonstrably improves outcomes for clients from varied racial, ethnic, and socioeconomic backgrounds. Clients deserve to see a workforce that represents them, and this bill will allow that to happen without sacrificing social work competence.

Repeating a statement over and over again does not make it true. ASWB has had 40 years to provide proof that their exams are correlated with safe and effective social work practice, and it has not done so. ASWB only released pass rate data under incredible pressure, as it proved what social workers have colloquially known for years. Much as ASWB would like to convince you otherwise, there simply is no true way to objectively measure social work competence. Social work is a highly person-centered profession, people are not standardized, and impossible-to-measure skills such as empathy are of ultimate importance to the field of social work. Research indicates that standardized tests are often culturally

biased, relying on knowledge and reasoning shaped by dominant cultural norms. Differing knowledge and ways of thinking are a core strength of social work, but our licensing exams treat them as liabilities to be weeded out.

Every new BSW graduates with at least 400 hours of supervised practice, and every MSW graduates with at least 900 hours of supervised practice. The best way to assess foundational social work skills is by careful observation by supervisors during education and supervised practice. Social work's rich tradition of field education and mentorship by more seasoned social workers is a far better tool to catch and address problems.

In addition to not providing any type of measurement of social work skill, ASWB exams are a huge financial burden on test-takers, especially those who have to take it multiple times. Students from already marginalized backgrounds have a harder time affording \$230-260 in exam fees, and the delays from retakes of the exams plus saving up for the exam fees only exacerbate inequalities that already exist.

Multiple other states have led the way in reducing the influence of harmful ASWB exams in their states. Colorado, Connecticut, Illinois, Minnesota, Rhode Island, Utah, and Vermont have all paused or removed exam barriers since the ASWB data release in 2022, with multiple other states never having exams for the Bachelors and Masters license levels. There is no evidence that lack of exams or exam removal have brought harm to the public. Because Illinois has some of the most easily accessible data and a slightly longer period of Masters level exam removal, they were studied in more detail in the Workgroup [final report](#) (page 36-37). Exam removal has had zero effect on the number of sanctions in that state.

Our BSWE is a member of the ASWB. It was one of few organizations afforded two seats on the Social Work Licensing Workgroup. Unfortunately, BSWE's allegiances are unclear and potentially problematic for a Maryland-based board. They consistently sided with ASWB's financial interests rather than centering the interests of Marylanders who are in desperate need of culturally responsive social work services. I applaud this legislation for increasing oversight by adding consumer members.

Maryland has long emphasized equity in a variety of other programs, and the field of social work should be no different. We have a wonderful opportunity to remove outdated, biased licensing models and instead modernize the social work licensing process in our state to address our behavioral health workforce demands. Thank you for accepting my testimony. Please find a favorable report on SB379.

Thank You for your consideration.

Sincerely,

*Victoria Rodriguez*

Victoria Rodriguez  
LCSW, LCSW-C, CCTP  
1/31/25



# **Will Doyle-Testimony on SB0379-Favorable-Senate Fi**

Uploaded by: William Doyle

Position: FAV

**February 4, 2025**

Testimony for Senate Finance Committee

Re: SB0379 State Board of Social Work Examiners - Membership and Examination Requirements

**Position: Favorable**

Good Afternoon Chair Beidle and Members of the Committee,

I fervently support **SB0379** in its current form. This bill repeals the examination requirements for bachelor and master social worker licenses, which aligns with the recommendations of Maryland's Workgroup on Social Worker Requirements for Licensure. Maryland formed a robust and diverse Workgroup that fully attended to its mandates, considering data and evidence to support its findings. From watching all of the open meetings, a range of voices and positions were expressed and considered. This included 2 representatives each from the ASWB and the BSWE, who were the only Workgroup members to oppose the recommendation to eliminate the ASWB exams. Besides their ongoing opportunities to share data to support their positions, both the ASWB CEO and the BSWE Executive Director also provided formal presentations to the Workgroup.

The ASWB and BSWE will certainly rehash their opposition to this bill in this hearing, but will not have data to back up their claims that the ASWB exams are valid, reliable and objective measures of social work competence and ethical practice. Without such evidence, there is simply no reason not to accept the recommendations of the Workgroup and pass this bill. Repeating false claims does not make them true. You will also likely hear from social workers who oppose this bill due to concerns about unintended consequences without any data to support their positions. I urge you to prioritize addressing the certain financial, mental and emotional harms that the ASWB exams inflict upon Maryland residents.

Passing **SB0379** will remove an unnecessary barrier for competent and safe social workers, enabling them to secure higher paying jobs that require licensure and addressing our workforce shortage. Given the known disparities in ASWB exam pass rates based on age, race and language, we will increase the diversity of our workforce and better match those in need of social work services.

Pathways to Housing DC provides Housing First and homeless outreach services in Montgomery and Prince George's Counties. As an employer of social workers, **Pathways to Housing DC is absolutely thrilled to hire qualified social workers who have not passed an ASWB exam.** We look forward to the passing of this legislation to increase our access to qualified social workers and expand our services in Maryland.

Based on the BSWE's repeated blind allegiance to the ASWB at the expense of Marylanders, I fully support adding 2 consumer members.

Thank you for considering my input. I am happy to answer any questions.

Sincerely,

Will Doyle, LICSW  
College Park, MD  
District 21  
Vice President of Housing First  
Pathways to Housing DC



# **NASW Maryland - 2025 SB 379 FWA - Social Worker Li**

Uploaded by: Anthony Estreet

Position: FWA



**Senate Finance Committee**

**February 4, 2025**

**Senate Bill 174**

**State Board of Social Work Examiners - Membership and Examination Requirements**

**\*\*\*SUPPORT WITH AMENDMENTS\*\*\***

To the Honorable Senate Finance Committee,

The National Association of Social Workers (NASW) is honored to have had the NASW Maryland chapter serve on the Maryland Department of Health Workgroup on Social Worker Requirements for Licensure. The final recommendations from this workgroup were instrumental in shaping Senate Bill 379, and we are pleased to offer our full support for this legislation. This bill seeks to repeal the examination requirements for the Bachelor of Social Work (LBSW) and Master of Social Work (LMSW) licensure and adjust the composition of the State Board of Social Work Examiners. We believe these changes are critical to expanding access to social work licensure and strengthening the social work profession in Maryland.

NASW has long advocated for equity, diversity, and inclusion in social work. On February 3, 2023, we issued a press release opposing the Association of Social Work Boards (ASWB) licensing exams, which disproportionately disadvantage social workers of color, older adults, and non-native English speakers, based on data showing significant pass rate disparities. These exams limit the pool of qualified professionals serving diverse communities. We support removing ASWB exam requirements for LBSWs and LMSWs and are committed to exploring more inclusive competency evaluation methods to address the behavioral health workforce shortage and meet growing demand, especially in underserved areas. NASW chapters in Illinois and Colorado have already successfully passed similar legislation.

We urge adoption of the following proposed amendment to clarify that the examination for applicants for the BSW and MSW licenses will still be offered to those who choose to take it as discussed in the workgroup:

**Amendment No. 1**

On page 4, after line 29, insert:

§ 19-303

(a) To apply for a license, an applicant shall:

(1) Submit an application to the Board on the form that the Board requires; and

(2) Pay to the Board the application fee set by the Board.

(b) The Board shall:

(1) Review each application;

(2) Within 15 business days after the initial receipt of an application and after the receipt of supplemental documentation, notify the applicant of whether the application is complete; and

(3) [Notify each applicant whether the applicant has been approved to take the pertinent licensure examination] within 60 days from the date the Board received a completed application from the applicant, ISSUE:

(A) FOR LBSW AND LMSW APPLICANTS, A LICENSE AND A NOTIFICATION OF APPROVAL TO TAKE THE PERTINENT LICENSURE EXAMINATION, OR

(B) FOR LCSW-C APPLICANTS, A NOTIFICATION OF APPROVAL TO TAKE THE PERTINENT LICENSURE EXAMINATION.

The National Association of Social Workers national office and NASW-MD strongly supports Senate Bill 379 with the above amendment and commends the sponsors for their leadership in addressing licensure barriers and promoting diversity and equity in the social work profession. We believe this legislation is a crucial step in strengthening Maryland's behavioral health workforce and ensuring that social service systems are better equipped to meet the needs of all Maryland residents.

We urge the Committee to issue a **favorable report on Senate Bill 379 with the above amendment.**

Sincerely,

Karessa Proctor, BSW, MSW (she/her)  
Executive Director - Maryland  
National Association of Social Workers (NASW) Maryland Chapter

Anthony Estreet, Ph.D., MBA, LCSW-C (He/Him)  
Chief Executive Officer  
National Association of Social Workers

# **NASW Maryland - 2025 SB 379 FWA - Social Worker Li**

Uploaded by: Karessa Proctor

Position: FWA



**Senate Finance Committee**

**February 4, 2025**

**Senate Bill 379**

**State Board of Social Work Examiners - Membership and Examination Requirements**

**\*\*\*SUPPORT WITH AMENDMENTS\*\*\***

To the Honorable Senate Finance Committee,

The National Association of Social Workers (NASW) is honored to have had the NASW Maryland chapter serve on the Maryland Department of Health Workgroup on Social Worker Requirements for Licensure. The final recommendations from this workgroup were instrumental in shaping Senate Bill 379, and we are pleased to offer our full support for this legislation. This bill seeks to repeal the examination requirements for the Bachelor of Social Work (LBSW) and Master of Social Work (LMSW) licensure and adjust the composition of the State Board of Social Work Examiners. We believe these changes are critical to expanding access to social work licensure and strengthening the social work profession in Maryland.

NASW has long advocated for equity, diversity, and inclusion in social work. On February 3, 2023, we issued a press release opposing the Association of Social Work Boards (ASWB) licensing exams, which disproportionately disadvantage social workers of color, older adults, and non-native English speakers, based on data showing significant pass rate disparities. These exams limit the pool of qualified professionals serving diverse communities. We support removing ASWB exam requirements for LBSWs and LMSWs and are committed to exploring more inclusive competency evaluation methods to address the behavioral health workforce shortage and meet growing demand, especially in underserved areas. NASW chapters in Illinois and Colorado have already successfully passed similar legislation.

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(2) Within 15 business days after the initial receipt of an application and after the receipt of supplemental documentation, notify the applicant of whether the application is complete; and

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(A) FOR LBSW AND LMSW APPLICANTS, A LICENSE AND A NOTIFICATION OF APPROVAL TO TAKE THE PERTINENT LICENSURE EXAMINATION, OR

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We urge the Committee to issue a **favorable report on Senate Bill 379 with the above amendment.**

Sincerely,

Karessa Proctor, BSW, MSW (she/her)  
Executive Director - Maryland  
National Association of Social Workers (NASW) Maryland Chapter

Anthony Estreet, Ph.D., MBA, LCSW-C (He/Him)  
Chief Executive Officer  
National Association of Social Workers

**SB 379 - BSWE - FIN - LOSWA.pdf**

Uploaded by: State of Maryland (MD)

Position: FWA



## DEPARTMENT OF HEALTH

Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Secretary

Maryland Board of Social Work Examiners  
4201 Patterson Ave., 3<sup>rd</sup> Floor  
Baltimore, MD 21215

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### 2025 SESSION POSITION PAPER

**BILL NO:** SB 379  
**COMMITTEE:** Finance  
**POSITION:** Support with Amendments

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**TITLE:** State Board of Social Work Examiners - Membership and Examination Requirements

**BILL ANALYSIS:** This bill repeals the examination requirements for bachelor and master social worker licenses and alters the number of consumer members on the State Board of Social Work Examiners.

**POSITION AND RATIONALE:** The Board of Social Work Examiners (“BSWE”) supports SB 379 with the following amendments:

**Amendment 1**

Page 2, lines 1 and 2, strike 14 and amend to 13; line 22 strike 4 and amend to 3.

**Amendment 2**

Page 2, line 23, add and amend the following language from HO Article §19-202(g)(5): Strike (i) and “Except as provided in subparagraph (ii) of this paragraph,”; Capitalize “a”; and strike (ii) in its entirety.

**Amendment 3**

Page 3, lines 7-8, strike the brackets.

**Amendment 4**

Page 3, lines 25-27 and Page 4, lines 1-11, strike in its entirety.

**Amendment 5**

Page 4, line 19, strike the brackets; lines 20-22, strike in its entirety.

The rationale for changing the number of consumer members from 14 to 13 (see **Amendment 1**) is that BSWE already has a high ratio of consumer to professional members. Upon review of



other health occupation Boards, BSWE has the 2<sup>nd</sup> highest ratio of consumer members. The BSWE highly values the input of consumer members and would welcome the addition of one additional consumer member which will also serve to make the Board composition an odd number, thereby facilitating voting.

**Amendment 2** will ensure that all Board members are given the opportunity to serve 2 consecutive full terms.

Regarding **Amendments 3 and 5**, BSWE supports the passage of a national exam as a minimum requirement for licensure. This requirement is in line with the requirements of other health occupation boards at the Bachelors and Master's degree levels. BSWE is one of twenty State health occupation boards and is not alone in requiring a national exam as a minimum level of competency for licensure. Despite this fact, BSWE is the ONLY health occupation that is facing the prospect of licensing health professionals who have not passed a national exam.

The primary responsibility for any health occupation board in Maryland is to protect the citizens of the State:

*“The mission of the health occupations boards is to protect the citizens of Maryland through the promotion of quality healthcare. This is achieved through maintenance of efficient licensure systems for healthcare professionals; promotion of disciplinary practices that contribute to an overall culture of accountability; education of clients and other stakeholders; and enforcement of applicable laws and statutes.”*

-from Department of Budget & Management – Managing for Results FY 2025

BSWE recognizes and validates the high cost that many disenfranchised social workers paid because of the ASWB exam. While deeply troubling, we also applaud ASWB for being transparent with the data that showed what is true of many professional exams - they can sometimes be biased and discriminatory.

Social Workers provide much needed mental health services to individuals, couples, families and children in a variety of settings. Lowering the standards for the social work license will open the door to having a greater number of other licensed mental health professionals working in the wide variety of settings where mental health treatment are critical services. This includes correctional settings which have an overrepresentation of people of color and people with preexisting mental illnesses.

As a point of reference, when comparing the Licensed Graduate Professional Counselor (LGPC) licensure requirements with the Licensed Master Social Worker (LMSW) licensure requirements, the LGPC requires specific college clinical coursework; national exam; state jurisprudence exam; a Criminal History Background Check (CHBC); and three personal references. Current statutes for the LMSW require an MSW degree; CHBC; and the national exam - these are already below the eligibility requirements of a graduate counselor license.

For organizations providing mental health services, the LGPC is currently better prepared for behavioral health roles. Salaries for LMSWs who have not had the same rigorous clinical coursework preparation and who have also not passed a national exam will be further devalued in

behavioral health roles. Insurance companies will be justified in offering lower reimbursement rates for LMSWs.

BSWE supports the need for highly qualified social work professionals in a variety of settings. School social workers provide much needed mental health services directly to students. Hospital social workers work in complex medical systems with other health professionals. When standards are lowered for social workers, we are not only devaluing the profession; we are also devaluing the clients we serve.

SB 379 is a result of the Workgroup on Social Worker Requirements for Licensure (SB 871, Acts of 2023). BSWE's concerns about the Workgroup are documented in a letter dated April 26, 2024, which is a part of the Workgroup's Final Report package. In summary, BSWE was concerned that the Workgroup had limited discussion about the long-term professional impact of removing the exam. Additionally, the Workgroup did not seem willing to fairly acknowledge or assess changes the Association of Social Work Boards (ASWB) has been making to address the issues of the widely published study data.

Furthermore, recommendations from BSWE regarding reducing the barriers around testing were seemingly buried in the Final Report despite many of the members agreeing with these recommendations. Three changes recommended by BSWE were:

1. Reduce the amount of time before an individual can re-take the exam. (The current wait time in Maryland is 90 days) - *18 members agreed - 2 disagreed*
2. Wave fees for re-testing - *19 members agreed - 1 disagreed*
3. Individuals unsuccessful in passing the ASWB exam will only have to re-take the section(s) they did not pass (like the Certified Public Accountant Exam) - *19 members agreed - 1 disagreed.*

BSWE respectfully asks that consideration be given to changes that remedy the harm caused by multiple failures of the exam rather than throw out the exam completely. It is disheartening for Board staff to see applicants fail over and over. The financial toll exacted on these applicants is real. BSWE asks that it be given the ability to issue waivers or design and implement alternative pathways to licensure. For example, Wyoming limits the number of failures to three. After the third time, the applicant can submit a remediation plan to the Board and take the exam one more time.

<https://mentalhealth.wyo.gov/professionals-1/examination-information>

While much needed attention is given to the racial disparity rates around passing the exam, consideration should also be given to the passing rates of 1<sup>st</sup> time test takers versus repeat test takers. According to the 2023 Pass Rate from ASWB, for the LMSW exam, of the 960 first time test takers – 678 or 70.6% passed. Of the 686 repeat test takers – only 153 or 22.3% passed. Could efforts be made to address the issues of repeat test takers? Perhaps by offering help to them, we can equitably break down barriers to all who do not pass on the first try - regardless of race.

In the end, by discontinuing the exam requirement – we are telling the over 19,000 currently licensed social workers in Maryland who have already passed an exam for licensure that their efforts did not matter.

The reasoning for **Amendment 4** is that the Board no longer issues the “certified social worker” or LCSW license.

Thank you for considering this testimony. The Board of Social Work Examiners is respectfully requests a favorable vote on SB 379 with amendments.

If you require additional information please contact Karen Richards, Executive Director of the Maryland Board of Social Work Examiners at (410) 764-4722 or [karen.richards2@maryland.gov](mailto:karen.richards2@maryland.gov) or Lillian Reese, Board Legislative Liaison, at (443) 794-4757 or [lillian.reese@maryland.gov](mailto:lillian.reese@maryland.gov).

*The opinion of the Board expressed in this document does not necessarily reflect that of the Department of Health or the Administration.*

# **Ekas testimony final .pdf**

Uploaded by: Adrienne Ekas

Position: UNF

January 31, 2025

**Dear Honorable Members of the Committee,**

I strongly oppose Senate Bill 379, which seeks to eliminate the examination requirement for bachelor's and master's social work licensure in Maryland. As a Maryland social work licensee with 25 years of experience, I have seen firsthand the importance of maintaining rigorous qualifications within the profession. My intersectional experiences have deepened my understanding of the critical role social workers play in serving Maryland's most vulnerable populations, and I believe strongly in preserving the qualifications that ensure competency and public trust in our profession.

Licensure exams are essential to ensuring that social workers possess the foundational knowledge and ethical competence necessary to meet the needs of clients. Eliminating this requirement compromises public trust, leaving clients uncertain about the qualifications of their providers. Clients have shared their concerns with me, voicing how critical it is for social workers to meet rigorous standards. It is clear that Maryland social workers serve the most fragile and vulnerable populations. The clients they support—whether in direct care or community settings—deserve social work services that are on par with other healthcare professions. No client in Maryland should be subjected to reduced qualifications for the professionals who serve them.

The data revealing disparities in exam pass rates highlights several systemic issues, including educational inequities, differences in access to resources, and potential biases in the exam design. Educational inequities reflect gaps in academic preparedness among students from diverse backgrounds. Access to resources reveals differences in financial ability to afford test preparation materials, courses, and exam fees. Systemic bias points to the potential for the exam to inadequately reflect the experiences of all test-takers. However, SB 379 contradicts these findings in significant ways. Rather than addressing the root causes of these disparities through targeted interventions—such as additional support and accessible test preparation—the bill eliminates the exam entirely. This approach fails to provide meaningful solutions to those facing barriers. Additionally, SB 379 bypasses efforts to improve educational systems and resources that could better prepare future social workers, leaving institutions and students without a clear pathway for validating competency. Finally, the bill misses an opportunity for reform, as it removes an essential assessment tool rather than working with licensing bodies to improve the exam process, such as increasing cultural sensitivity or exploring alternative testing methods. This could potentially weaken the profession's standards.

I've spoken with social work employers who have stated they would not hire LBSW or LMSW social workers who have not taken the licensing exam, as they do not want to be responsible for supervising individuals who haven't passed a basic competency test. If employers do hire social workers in this group, they will likely offer lower pay. Why would any employer offer the same salary for someone with fewer qualifications? Consider how social workers at prestigious institutions in Baltimore—such as advanced medical centers and VA facilities—might be viewed. Without a licensing exam, these social workers working alongside other highly qualified

healthcare professionals risk losing respect, responsibilities, and opportunities. If this happens, Maryland could end up creating a “separate but equal” system of social workers.

For these reasons, I urge the Maryland General Assembly to give an unfavorable report for Senate Bill 379 and instead focus on meaningful support for test-takers while preserving the licensing exam as a safeguard for public safety and professional excellence. Eliminating the exam threatens the integrity of social work and puts vulnerable clients at risk.

Lastly, as a member of the Maryland SB871 Workgroup for Social Work Requirements for Licensure, I need to point out that we did not fulfill all of the requirements of the bill – specifically this one:

*(h) The Workgroup shall: (1) examine each type of license established under Title 19 of the Health Occupations Article by: (i) conducting a bias analysis of the qualifications for each type of license;*

Therefore, the bias analysis could have helped identify any systemic barriers that might disproportionately affect certain groups, so its omission is a significant gap.

**Thank you for your time and consideration.**

*Adrienne Ekas, PhD, LCSW-C*

Adrienne Ekas, PhD, LCSW-C

# **Testimony SB 379 Eliminating Exams Oppose 2025.pdf**

Uploaded by: Dionne Bushrod

Position: UNF

Senate Finance Committee

January 31, 2025

SENATE BILL 379

State Board of Social Work Examiners – Membership and Examination Requirements

\*\*\*OPPOSE\*\*\*

Honorable Members of the Committee,

My name is Dionne Brown-Bushrod. I am a Maryland Licensed Certified Clinical Social Worker, and I strongly oppose Senate Bill 379, which seeks to eliminate the examination requirement for bachelor's and master's social work licensure in Maryland. While I am unclear on the bill's intent—whether to address workforce shortages or combat racism—I must emphasize that whatever the reason, this bill undermines public trust, professional integrity, and social work's standing as a healthcare profession.

Licensing exams ensure that Licensed Bachelor Social Workers (LBSWs) and Licensed Master Social Workers (LMSWs) possess the foundational knowledge and ethical competence to serve Maryland's most vulnerable populations. These professionals work in nursing homes, hospitals, crisis centers, and community programs, providing essential services in mental health, substance use, care coordination, and program administration.

Eliminating the exam removes an essential expectation set by the public. One client put it plainly: *"If a doctor takes a test, I think everyone who says they are a professional should take a test."* Another client stated: *"If I just wanted to talk to someone with a college degree, I could talk to my friends. The person helping me should have to meet professional standards, and taking a test is one of them."* The public expects qualified professionals, and lowering standards for social work licenses sends the wrong message about the quality-of-care clients should receive.

**If the Public's Concerns Do Not Give Pause, Consider the Other Harmful Consequences of This Bill**

- LMSWs are legally required to practice under supervision. Without an exam verifying their baseline competency, many supervisors will hesitate to put their own licenses at risk by supervising untested licensees.
- I began my social work career at Spring Grove Hospital Center, working alongside psychiatrists, psychologists, and psychiatric nurses. I later served as a social worker at Sheppard Pratt. Can you imagine how I would have been treated if I lacked the same licensure qualifications as my colleagues? Being a good person and trying your best is not what makes a profession—credentials matter and the road to credentials matter.
- Employers will see untested social workers as less qualified and higher-risk hires, leading to lower pay and fewer job opportunities compared to their peers in healthcare who meet exam-based qualifications.
- Without an exam, how can we differentiate LBSWs and LMSWs from lower-paid community or social service workers who are not considered healthcare professionals under the Maryland Health Occupations Article? If social work no longer aligns with other licensed healthcare



professions, will legislators move the profession out of the health occupations category entirely? What happens when other healthcare professions challenge social work's place in the healthcare profession?

If this bill was intended to address workforce shortages, I must point out that the 2023 Senate Bill 283 that created the needs assessment for behavioral healthcare talent highlighted the critical and growing need for behavioral health providers. Please note that none of the other healthcare professions facing shortages are lowering their qualifications to address the problem.

If this bill is meant to address social justice, then I must ask—where is the full complement of social justice initiatives? Are we truly making meaningful changes, or are we legislating performative action instead of substantive reform? Eliminating the exam does not solve systemic disparities. It ignores bias in education, access to resources, and structural inequities from preschool through graduate school. Testing pass rates serve as a diagnostic tool to identify where support is needed, not just in social work, but across all licensed professions.

This bill creates a feel-good moment at the cost of real progress. It will ultimately disenfranchise the social work profession, especially marginalized licensees who will face even greater challenges without a recognized and respected licensure process. How is that justice?

I urge an unfavorable report and reject Senate Bill 379 and instead focus on strengthening licensure requirements, not eliminating them. Public trust, professional credibility, client safety, client expectations and real social justice depend on it.

Thank you for your time and consideration.

Sincerely,

Dionne Brown-Bushrod, MSW, LCSW-C

# **Honorable Members of the Committee.pdf**

Uploaded by: Doncella Wilson

Position: UNF

Honorable Members of the Committee,

I strongly oppose Senate Bill 379, which seeks to eliminate the examination requirement for bachelor's and master's social work licensure in Maryland. As an African American Maryland social work licensee with 15 years of experience, I have seen firsthand the importance of maintaining rigorous qualifications within the profession.

Licensure exams are essential to ensuring that social workers possess the foundational knowledge and ethical competence necessary to meet the needs of clients. Eliminating this requirement compromises public trust, leaving clients uncertain about the qualifications of their providers. As a Social Worker in Maryland there was also no survey or poll of Social Workers to determine our status of SB 379. Again, you have people making decisions without the body they represent weighing in.

Below is my reasoning for opposing Senate Bill 379.

### **1. Contradiction to Identified Disparities**

The data showing disparities in exam pass rates has pointed to systemic issues such as:

- **Educational Inequities:** Gaps in academic preparedness among students from diverse backgrounds.
- **Access to Resources:** Differences in financial ability to afford test prep materials, courses, and exam fees.
- **Systemic Bias:** Potential biases in exam design that do not adequately reflect the experiences of all test-takers.

#### **How SB 379 Contradicts These Findings:**

- **Ignoring the Root Causes:** Instead of addressing systemic inequities through targeted interventions, such as additional support and accessible test preparation, SB 379 eliminates the exam altogether, failing to provide meaningful solutions to those facing barriers.
- **Failure to Improve Education Systems:** The bill bypasses efforts to enhance educational opportunities and resources that could better prepare future social workers, leaving institutions and students without a clear pathway for competency validation.
- **Missed Opportunity for Reform:** Instead of working with licensing bodies to improve the exam process (e.g., cultural sensitivity, alternative testing methods), the bill removes an essential assessment tool, potentially weakening the profession's standards.

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### **2. Compromises Public Safety and Professional Competence**

- **Risk of Incompetent Practice:** Licensing exams serve as an objective measure to ensure that social workers possess the minimum required knowledge and competencies to practice safely and ethically. Without exams, there is no standardized mechanism to verify

competency, which could result in unqualified individuals providing services to vulnerable populations.

- **Increased Risk to Clients:** Social workers often work with individuals facing complex mental health, substance abuse, and social crises. A lack of standardized assessment may lead to critical knowledge gaps, increasing the risk of harm to clients and communities.
- **Lack of Accountability:** The absence of an exam removes a key component of professional accountability, making it difficult to assess the readiness of new practitioners and uphold standards of care.

#### **Counterpoint to Supporters' Argument:**

While supporters argue that educational training and practical experience are sufficient measures of competence, academic programs vary in rigor, and without a uniform assessment, there is no guarantee that all graduates meet the same level of knowledge and ethical understanding required for professional practice.

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### **3. Licensing Exams Ensure Standardization and Professional Integrity**

- **Uniformity Across Jurisdictions:** Many states require social work licensure exams, ensuring a consistent standard of practice nationwide. Removing the exam requirement could isolate Maryland professionals and create barriers to interstate mobility.
- **Regulatory Consistency:** Exams provide an objective way to measure competence across various educational backgrounds, ensuring that all licensed professionals meet the same baseline expectations.
- **Employer Confidence:** Organizations that hire social workers rely on licensure exams to verify a candidate's readiness. Without it, employers may face challenges in assessing qualifications, potentially leading to hiring risks and increased training costs.

#### **Counterpoint to Supporters' Argument:**

While some states are exploring alternatives to licensing exams, most still recognize the importance of objective assessment tools to maintain consistency and protect public interest. The absence of exams could lead to fragmented regulatory frameworks.

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### **4. Disadvantages to Future Licensees**

Eliminating the licensing exam requirement could negatively impact future social workers by:

- **Limiting Interstate Mobility:** Many states require exams for social work licensure, meaning Maryland social workers may struggle to gain licensure elsewhere, limiting career opportunities.
- **Employer Skepticism:** Without a standardized exam, employers may prefer candidates from states with exam-based licensure, putting Maryland graduates at a disadvantage.
- **Professional Confidence:** Without the rigor of exam preparation, licensees may lack confidence in their competency, potentially affecting their performance and career advancement.

- **Insurance and Credentialing Challenges:** Many insurance companies and organizations require proof of licensure through exams to ensure professionals meet established benchmarks.
- 

## 5. Potential Legal and Ethical Challenges

- **Liability and Malpractice Risks:** Without a standardized exam, employers and the regulatory board may face increased liability if unqualified practitioners provide substandard services, potentially leading to malpractice lawsuits and loss of public trust.
  - **Challenges in Disciplinary Actions:** The licensure exam serves as a legal benchmark for competency. Without it, disciplinary actions against incompetent practitioners may become more difficult, weakening regulatory enforcement and professional accountability.
  - **Regulatory Fragmentation:** Removing the exam may result in inconsistent criteria for licensure across states, creating confusion for professionals seeking cross-jurisdictional practice.
- 

## 6. Workforce Challenges Should Be Addressed Through Better Support, Not Lowering Standards

- **Retention and Support Over Elimination:** Addressing social work shortages should focus on better incentives, loan forgiveness programs, and stronger mentoring opportunities rather than compromising licensing standards.
  - **Short-Term Fix with Long-Term Consequences:** Removing the exam might offer immediate relief for workforce shortages, but the long-term consequences could include higher turnover, client dissatisfaction, and overall decline in service quality.
- 

## 7. Professional Recognition and Interstate Mobility

- **Reduced Professional Mobility:** Maryland social workers may face challenges when seeking licensure in other states, as most jurisdictions require exams. This could limit career growth and professional opportunities.
  - **Challenges with National Certification:** Without exams, Maryland professionals might face barriers in obtaining certifications that are recognized nationally.
- 

## 8. Board Composition Changes Could Weaken Professional Oversight

- **Loss of Expert Oversight:** Reducing the number of licensed social workers on the State Board of Social Work Examiners could result in a lack of expertise in making regulatory decisions, potentially leading to policies that do not adequately address the complexities of social work practice.

- **Imbalance in Representation:** Consumer input is valuable, but professional oversight is critical in ensuring licensure standards and ethical considerations remain a priority.

Sincerely,

Doncella Wilson, LMSW

# **J. Brown Opposing the bill 1-2025.pdf**

Uploaded by: Jalicia Brown

Position: UNF

Jalicia Brown- LCSW-C #14024

My name is Jalicia Brown. I am. Licensed Certified Social Worker-Clinical. **I OPPOSE this bill because removal of a minimal level of competency lowers professional standards.** I worked hard to obtain my clinical license after graduating from the University of Maryland School of Social Work with a Master of Social Work degree in 2008. I remember being in class talking to my peers about taking the, at the time, LGSW exam and we were so excited to become licensed social workers understanding that we had more work and supervision to complete before we could sit for the LCSW-C. As soon as I had enough supervision and work hours to submit my paperwork, I did so. I worked with my clinical supervisor and bought testing materials to prepare for the exam. When I passed, I had tears of joy in my eyes. I reflected on all the hours of hard work and late night studying to get me to this point. I obtained my first clinical job later in 2011 and when they asked for a copy of my license, I was SO proud to make a copy of my license for them. I still have my original license framed in my office space. I am proud to be a LICENSED social worker. To take these very important competency tests away would not only effect the pay of current and future licensed social workers it would also allow for non-licensed social workers to practice social work and potentially cause undue harm to their future clients. It would DUMB down my profession. A profession that I love so very much and worked my butt off to obtain! Please do not remove the competency tests. The negative impact it will have on my field would be catastrophic and will have long lasting irreversible effects on us all.

Thank you for your time and attention to this matter.

Jalicia A Brown, LCSW-C #14024



# **2025 Opposition to Senate Bill 379.pdf**

Uploaded by: Shatiea Blount

Position: UNF

Testimony in Opposition of Senate Bill 379  
Maryland Senate Finance Committee  
Submitted by: Dr. Shathea Blount, LCSW-C  
Date: January 30, 2025

I am writing to express my strong opposition to Senate Bill 379, which seeks to eliminate the examination requirement for bachelor's and master's level social work licensure. While I acknowledge the concerns regarding bias in the exam and disparities in pass rates, removing the exam entirely is an overcorrection that could have serious unintended consequences for both the profession and the communities we serve.

The licensure exam serves a critical purpose: to assess whether individuals entering the profession possess the foundational knowledge necessary to practice safely and ethically. Social workers provide services to vulnerable populations, and without a standardized measure of competency, we risk lowering the quality of care. The absence of an exam requirement may particularly have harmful effects in clinical settings, including both private practice and community-based work, for the following reasons:

### **Potential Risks to Public Safety and Ethical Standards**

Social workers often handle complex cases involving mental health, trauma, and crisis intervention. The exam ensures that professionals entering the field have at least a minimum level of competency in core areas such as ethics, assessment, intervention, and legal responsibilities. Eliminating this requirement could result in inadequately prepared practitioners providing services to at-risk individuals, increasing the likelihood of harm.

### **Threats to Insurance Reimbursement and Professional Credibility**

Many insurance companies require licensed social workers to meet specific competency standards, which typically include passing a national exam. If Maryland no longer mandates an exam for licensure, insurers may hesitate to reimburse services provided by bachelor's and master's level social workers, thereby limiting client access to care and reducing job opportunities for new graduates. This change could also have national implications, making it more difficult for Maryland social workers to obtain licensure in other states, which may still require an exam for reciprocity.

### **Undermining the Fight for Pay Parity**

Social workers already face significant pay disparities compared to psychologists, despite performing comparable clinical duties in many settings. Eliminating the exam requirement may further weaken the profession's ability to advocate for fair compensation, as it may be perceived

as a dilution of professional standards rather than a step toward equitable access to licensure. Additionally, other professions, such as psychology, counseling, and nursing, maintain examination requirements as a safeguard for competency and professional integrity. If social work abandons this standard, it risks being devalued in interdisciplinary settings, making it even harder to argue for equal pay and professional recognition.

The bias in the licensure exam is a valid concern, but the solution should be to fix the exam, not eliminate it. Policy advocacy should move the profession forward, not backward. While I fully support addressing disparities in social work licensure, removing the exam requirement is a misguided approach that could have serious consequences for professional credibility, public trust, and access to equitable compensation. I urge you to vote against Senate Bill 379 and instead support initiatives that address the root causes of disparities in exam performance without compromising public safety or professional integrity.

Thank you for your time and consideration.

Shatiea Blount  
CEO  
Eye In Me, LLC  
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Suite 500-118  
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[shatiea@eyeinme.com](mailto:shatiea@eyeinme.com)

**ASWB MD SB0379 Testimony - SHC Opposition.pdf**

Uploaded by: Stacey Hardy-Chandler

Position: UNF



Association of Social Work Boards

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Senator Pamela Beidle  
Senate Finance Committee  
Maryland General Assembly  
3 East Miller Senate Office Building  
Annapolis, MD 21401

***Re: Opposition to Senate Bill 0379, "State Board of Social Work Examiners – Membership and Examination Requirements" and raising awareness of conflicts with Senate Bill 0174 and House Bill 0345***

Friday, January 31, 2025

Dear Chair Beidle and Distinguished Committee Members:

My name is Dr. Stacey Hardy-Chandler. I am the Chief Executive Officer of the Association of Social Work Boards (ASWB), the nonprofit professional regulatory association that supports the Maryland Board of Social Work Examiners in the fulfillment of its public protection mandate. I write to your committee today in opposition to Senate Bill 0379, "State Board of Social Work Examiners – Membership and Examination Requirements" and also to raise awareness of complications this legislation would present for Maryland's adoption of the licensure compact as proposed in two recently introduced pieces of legislation: Senate Bill 0174 and House Bill 0345.

Our opposition is specific to the bill's provision of an option to issue a license without an examination. This view is based on ASWB's position that the public's need for consistency regarding what it means when services are provided by an individual using the title of "licensed social worker" and fair and objective competence measurements are both vital to professional licensure decisions.

Like other professional healthcare associations, ASWB provides resources, services, and technical support to regulatory entities throughout the United States and Canada. This support includes overseeing the development and administration of the social work licensing examinations. Founded more than 45 years ago, ASWB is the only nonprofit organization dedicated to social work regulation representing all 64 state and provincial governments.

Core to our mission is accountability and public protection through the regulation of safe, competent, and ethical social work practices. Objective entry-to-practice competence measurements help us achieve that mandate. Our work ensures that the Maryland Board of Social Work Examiners, as an ASWB member board, has access to the data and tools required to provide oversight for the social work profession, including initial licensure decisions. The integrity of our work on behalf of our members is what compels me to raise concerns with Senate Bill 0379.

Senate Bill 0379 eliminates the authority of the Maryland Board of Social Work Examiners to require competence assessment for social work licensure, removing the licensing exam requirement for the bachelor's and master's categories of social work licensure in Maryland. As with other professions in Maryland, social work is a licensed, regulated profession. This designation demands uniform standards that uphold the public's confidence and trust. To protect the public and professional practitioners, licensed professions require uniform entry-to-practice competence measurements. These measurements help bring legitimacy to those serving in the field – and assurances to the individuals in their care.

Professional licensure decisions generally include education, experience, and examination. Of these, the exams are the only part of license issuance decisions overseen by regulatory entities, including the Board of Social Work Examiners. Importantly, they are the only uniform aspect of this process across jurisdictions. Best practices dictate that regulators should directly oversee some component of the vital decision, as opposed to singular reliance on an external sector such as education serving as the primary determiner of licensure approvals. Licensing exams bring legitimacy and support public confidence in regulated professions.

Moreover, professional exams offer the only continuously vetted, objective measurement of entry-to-practice competence in license issuance decisions. The development process for these exams begins with a practice analysis which sources content about social work practice from those who are actually practicing. These national surveys of the profession – the most recent of which took place from March to June 2024 – ensure that the licensing exams keep pace with evolving standards of practice.

The development process also involves robust anti-bias measures and embeds layers of checks and balances beyond anything available in degree-granting institutions. As with licensing exams for other health professions like medicine, nursing, pharmacy, and psychology, social work licensing exams are reliable, are valid, and involve a psychometric process that adheres to industry standards developed jointly with the American Educational Research Association, the American Psychological Association, and the National Council on Measurement in Education.

In some way, all of us are accountable to the public. Professional exams factor solidly into public accountability by offering a mechanism for telling the public something about the qualities and capacities of someone calling themselves a “licensed social worker.” These exams verify minimum competence to practice as part of the Board of Social Work Examiners’ duty of accountability to the public. Educational degrees and supervised experience are other aspects of the license issuance equation. Each of these components offers critical and distinct information that cannot be substituted by the other two; they are complementary, not interchangeable. Combined, all three components of the licensure accountability equation offer the level of regulatory diligence and oversight that communities served by social workers deserve.

The removal of the exam requirement diminishes our accountability to the public we serve. In this instance, it also jeopardizes Maryland’s ability to participate in and enjoy the benefits of the interstate social work licensure compact. This poses a challenge to not only the state’s social work workforce but also the communities they serve. The interstate social work licensure compact will enable licensed social workers to serve clients in every state that joins the compact. However, this compact requires social workers to take and pass the qualifying national exam that corresponds with the category of multistate license sought by a practitioner.

Finally, I urge the committee to take note of a recent nationwide survey conducted by the American Foundation for Research and Consumer Education in Social Work Regulation which reveals that a vast majority of social workers support use of the exam. The survey shows 76% of social workers believe the exam is crucial for maintaining high professional standards, and 78% advocate for its necessity for new professionals. Additionally, 73% consider it a mistake to remove the exam requirement, reflecting a strong commitment to the exam as a necessary component of licensure. ASWB stands by the exam as a highly vetted process offering fairness to candidates and assurances to the public that licensed professional social workers serve.

Respectfully submitted,



Stacey D. Hardy-Chandler, PhD, JD, LCSW, PGDip  
Chief Executive Officer  
Association of Social Work Boards

*ASWB is a nonprofit association whose members comprise the 64 social work licensing authorities from the United States and Canada. ASWB is recognized under section 501(c)(3) of the Internal Revenue Code as an entity that provides programs and services to social work regulatory boards in promoting uniformity and lessening burdens on state governments.*

**ASWB MD SB0379 Testimony - SHC Opposition.pdf**

Uploaded by: Stacey Hardy-Chandler

Position: UNF



Association of Social Work Boards

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Senate Finance Committee  
Maryland General Assembly  
3 East Miller Senate Office Building  
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Core to our mission is accountability and public protection through the regulation of safe, competent, and ethical social work practices. Objective entry-to-practice competence measurements help us achieve that mandate. Our work ensures that the Maryland Board of Social Work Examiners, as an ASWB member board, has access to the data and tools required to provide oversight for the social work profession, including initial licensure decisions. The integrity of our work on behalf of our members is what compels me to raise concerns with Senate Bill 0379.

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Finally, I urge the committee to take note of a recent nationwide survey conducted by the American Foundation for Research and Consumer Education in Social Work Regulation which reveals that a vast majority of social workers support use of the exam. The survey shows 76% of social workers believe the exam is crucial for maintaining high professional standards, and 78% advocate for its necessity for new professionals. Additionally, 73% consider it a mistake to remove the exam requirement, reflecting a strong commitment to the exam as a necessary component of licensure. ASWB stands by the exam as a highly vetted process offering fairness to candidates and assurances to the public that licensed professional social workers serve.

Respectfully submitted,



Stacey D. Hardy-Chandler, PhD, JD, LCSW, PGDip  
Chief Executive Officer  
Association of Social Work Boards

*ASWB is a nonprofit association whose members comprise the 64 social work licensing authorities from the United States and Canada. ASWB is recognized under section 501(c)(3) of the Internal Revenue Code as an entity that provides programs and services to social work regulatory boards in promoting uniformity and lessening burdens on state governments.*

**SB379\_unfavorable.pdf**

Uploaded by: Stacey Owens

Position: UNF

To the Chair and Committee Members:

My name is Stacey Owens. I am a licensed social worker in Maryland.

I am asking that you vote no on SB 379.

- I am testifying against SB 379 because I believe that removing the requirement for a social work licensing exams will pose a risk to the public, and that lowering professional standards is especially concerning in a field that serves people who are vulnerable.
- Additionally, I believe that removing the licensing exam requirement poses a risk to the livelihood and earning potential of licensed social workers in Maryland.
- The bill presumes that competence is established solely through the completion of an education program. This conclusion threatens public protection and diminishes the State's regulatory accountability.
- Education programs, though accredited, are varied in their instructional approaches and student experiences. A licensing exam, on the other hand, is a uniform, measure. It gets its validity through an analysis of the practice of social work and ensures that exam content reflects knowledge, skills, and abilities needed for safe, competent, and ethical practice.
- Social work is a health profession. Just like other health professions such as physicians, nurses and psychologists, the social work exam is created based on what those working in real life settings define as critical entry to practice knowledge.
- Removing an examination requirement will devalue the social work profession and decrease our parity with other health professionals.
- It will also prevent Maryland from becoming part of the social work compact, which will in turn diminish the earning potential and licensure portability eligibility for licensed social workers Maryland.
- In conclusion, I urge you to consider the unintended consequences of this bill. Social work is a valuable profession; an exam is a vital part of identifying that value and protecting the public by evaluating competency.

I again ask that you vote no on SB379. Thank you for your time.

Sincerely,

-Stacey Owens, M.S.W., LCSW-C

**MOPD SB0379 Written Testimony Repeal SW Exam.pdf**

Uploaded by: Terri Collins-Green

Position: UNF



**NATASHA DARTIGUE**  
PUBLIC DEFENDER

**KEITH LOTRIDGE**  
DEPUTY PUBLIC DEFENDER

**MELISSA ROTHSTEIN**  
CHIEF OF EXTERNAL AFFAIRS

**ELIZABETH HILLIARD**  
ACTING DIRECTOR OF GOVERNMENT RELATIONS

## POSITION ON PROPOSED LEGISLATION

**BILL: SB 0379 - State Board of Social Work Examiners - Membership and Examination Requirements**

**FROM: Maryland Office of the Public Defender**

**POSITION: Unfavorable**

**DATE: 01/31/2025**

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The Maryland Office of the Public Defender respectfully requests that the Committee issue an unfavorable report on Senate Bill 0379.

As LCSW-Cs with a combined total of 32 years of licensed professional social work practice we collectively acknowledge the alarming nature of the racial disparity in exam passage rates, we validate the emotional pain and financial burdens imposed on those impacted groups, and we stand firmly in agreement that any racial discrimination should be eradicated as it is in direct opposition with the values of the social work profession. However, we strongly assert that elimination of the LBSW and LMSW examinations which are objective measures of competency will undermine the efficacy of the profession as a whole, and cause long-term collateral consequences that are unseen at this current time. Below are our shared points of contention:

- **Negative Impact of the Elimination of the Examination Requirement**
  - 1. Public Safety and Quality of Client Care**

Social workers are often the first responders to mental health crises involving suicidal ideation, homicidal ideation, and the threat of self harm presented by clients. Such mental health crises may arise for clients regardless of an assigned social worker's level of experience or area of practice. For example, social workers who primarily deliver case management services can still be exposed to these client circumstances and are required to act. Because social workers have an ethical obligation to social welfare, it is imperative for the safety and

wellbeing of clients and the general public that social workers are competent and prepared to execute appropriate and responsive evaluations as well as the development of a plan for next steps to ensure safety for clients. Moreover, incidents arise where it is critical to act quickly and gather the needed information to keep a client safe, and clinical supervisors cannot be present for each and every interaction an LMSW has with a client. A baseline level of competency is required during such interactions with clients that cannot wait until case review or supervision. It is highly concerning that the existing measure, the Maryland Board of Social Work Examiners (BWSE) licensing exam, would be eliminated without an alternative measure to assess competency and ensure quality of care. Elimination of the exam will leave vulnerable clients at a greater risk of being a victim of social work malpractice (failure to provide competent services).

## **2. Ethics Competency**

Per the National Association of Social Workers (NASW) Code of Ethics (2021), “Professional ethics are at the core of social work.” Not only is it essential for social workers to be able to identify and resolve ethical dilemmas that arise in the course of our work, but it is also critical that the general public has ethical standards by which the profession can be held accountable. As such, social workers’ knowledge of the Code of Ethics is assessed prior to providing services to clients via the licensure examination. Even at entry level, social workers must be able to identify ethical dilemmas, collect and process information, and report the dilemma to a supervisor to navigate in supervision. Frequently in practice, social workers face conflicting ethical responsibilities and values and therefore must be able to navigate such dilemmas consistently and within the spirit of the Code of Ethics. Elimination of the licensure examination requirement removes any objective measure of ethical integrity from the social work profession.

## **3. Social Workers as Experts in Legal Matters**

Social workers, particularly those employed by the Maryland Office of the Public Defender, are often called upon to serve as expert witnesses in legal matters pertaining to mental health, juvenile offenders, parental rights, and mitigation in sentencing. Social workers are uniquely positioned to provide expert testimony on such matters because of our profession’s training and focus on the cumulative biopsychosocial factors that influence human behavior

and in particular, that of vulnerable populations. Over the past two decades, the Social Work Division of MOPD has grown into a nationally-recognized model of how social workers can utilize their expertise in legal contexts to improve the efficacy of public defense.

In order to be qualified as an expert witness in the field of social work and provide expert witness testimony, a social worker is questioned by both the defense attorney and the state's attorney. The social worker must prove their competence, work experience, education, and expertise through their responses to Voir Dire questions. Questions include but are not limited to: social work board examination, licensure, degree, training, and supervision requirements. The judge must agree and accept to move the social worker's CV into evidence and stipulate to their expertise based on the thoroughness and credibility proven during the social worker's responses to Voir Dire questions. According to the Daubert Standard (Stanley Rochkind v. Starlena Stevenson, No. 47, September Term, 2019. Opinion by Getty, J.), the following reliability factors must be considered:

- (1) whether a theory or technique can be (and has been) tested;
- (2) whether a theory or technique has been subjected to peer review and publication;
- (3) whether a particular scientific technique has a known or potential rate of error;
- (4) the existence and maintenance of standards and controls;
- (5) whether a theory or technique is generally accepted;
- (6) whether experts are proposing to testify about matters growing naturally and directly out of research they have conducted independent of the litigation, or whether they have developed their opinions expressly for purposes of testifying;
- (7) whether the expert has unjustifiably extrapolated from an accepted premise to an unfounded conclusion;
- (8) whether the expert has adequately accounted for obvious alternative explanations;
- (9) whether the expert is being as careful as he or she would be in his or her regular professional work outside his or her paid litigation consulting; and

(10) whether the field of expertise claimed by the expert is known to reach reliable results for the type of opinion the expert would give.

The court has to weigh all of the 10 factors to decide if the evidence/testimony can be admitted. It is essential that the committee recognizes that a wide range of professions require examinations to obtain a license, including healthcare practitioners like doctors and nurses, legal professionals like lawyers, educators like teachers, financial professionals like accountants, engineers, architects, electricians, plumbers, and many other fields; essentially, any profession that requires a license necessitates passing an examination to qualify. These exams are designed to ensure competency and ethical practice within a profession, protecting the public safety by verifying the individual's knowledge and skills. The assertion that the exam does not effectively assess “quality” or “safety” is a false negative. We would have to assume that either the social work exam is an anomaly in comparison to all other professional exams, and agree that all other professional exams are not biased. Simply put, quality and competency are not synonymous.

We respectfully provide the below list of strategically crafted and considered options to the repeal of the exams:

### **Alternatives to Elimination of the Exam Requirement**

#### **1. Amend the drafting process of the exam to better reflect cultural competencies**

The deficits of the Board of Social Work examination must be fixed and the racial disparities rectified. It is perplexing that amending and correcting the examination to reflect an equitable and inclusive objective measure for all social workers has not been attempted. Confronting the damage done and developing reparations would serve as a model to other disciplines with racial disparities in passing rates of board licensing examinations. As social workers, we are agents of change, we tirelessly advocate for social justice. Discarding any examination to evaluate competence is injustice for our clients and social work colleagues. By eliminating the examination all together, we are avoiding confronting oppression, and abandoning the opportunity to create long-lasting change.

#### **2. Improve educational curriculum in schools**



It is the responsibility of each and every graduate school of social work to prepare students to be able to articulate social work knowledge, theory, and practice in a way that benefits the students and public. Deans of graduate schools, accreditation bodies, and professors who have hands-on relationships with students should reevaluate the current rates of students who are not able to pass the exam in its current form. Students seek education from schools that have been accredited and approved to provide social work education. It is the expectation that after graduation students are able to participate in a meaningful way in their chosen career including passing the licensing exam.

**3. Enact additional measures to promote passage rates/reduce inequitable barriers to entry in the profession.**

Structural racism is a system of policies, practices, and beliefs that give some people an unfair advantage based on their race or ethnicity. Structural racism has played a significant role in the bias found in the exam. Some recommendations to decrease barriers include development and implementation of a course designed to provide exposure and prepare students of disadvantaged background with testing content areas and types of questions. Teaching students techniques to manage test/performance anxiety when taking the exam. Integrating testing instruments that mirror components of the licensing exam throughout the MSW academic experience along with the papers that students are required to complete as a part of the designated coursework. Encourage and seek out individuals that are reflective of those communities that the current exam is biased to assist in exam question development. Reducing or removing fees after an initial testing attempt may reduce economic barriers to licensing along with providing low cost test preparation materials, classes, and practice guides.

**For these reasons, the Maryland Office of the Public Defender urges this Committee to issue an unfavorable report on Senate Bill 0379.**

**Submitted by: Maryland Office of the Public Defender, Government Relations Division.**

**Authored by: Ava Reid, LCSW-C, #23195, MOPD Social Work Supervisor**

**Lindsey Balogh, LCSW-C, #21914, JD, MOPD Advanced Social Worker**

**Mwuese Igyor, LCSW-C, #22485, MOPD Social Work Supervisor**

**Terri Collins-Green, LCSW-C, #13410, MOPD Director of Social Work**

# **ag opinon commercial free speech.pdf**

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Position: INFO

opportunity to prove the propriety of that the State is proceeding  
arbitrarily and unconstitutionally.

Conclusion

In summary, it is our opinion that a referendum must be al-  
forded an opportunity to show that a referendum has even-  
sisted the repeal action based on constitutionally imper-  
missible motives. The herein and procedures for that  
challenge should remain those adopted for other constitu-  
tional challenges to state action.

STEPHEN H. SACHS, Attorney General

DEBORAH K. HANDEL, Chief, Technical Appeals

Division

AVERY AISENSTADT

Principal Counsel

Unions and Affairs

*right to assembly & exercise  
Professional Services regardless  
of provider title professional  
title*

CONSTITUTIONAL LAW - COMMERCIAL SPEECH - PSYCHOLOGISTS - PERSONS AUTHORIZED TO PRACTICE PSYCHOLOGY MAY NOT BE PRECLUDED FROM USING TRUTHFUL TERMS TO DESCRIBE THAT PRACTICE.

July 7, 1981

*The Honorable Harry Hughes  
Governor of Maryland*

On April 28, 1981, we reviewed and approved, for constitutionality and legal sufficiency, House Bill 766 (Psychologists - Licensing) (on April 28, 1981, the bill was signed into law as Chapter 236, Laws of Maryland 1981).

While we generally approved the bill for constitutionality, we nevertheless raised one issue:

"We are . . . concerned about provisions of House Bill 766 . . . which, among other things, prohibit certain family counselors from using the words 'psychological,' 'psychologists,' or 'psychology' in describing their title or services. [§16-102 of the Health Occupations Article.] A question is raised as to whether this prohibition violates First Amendment rights of commercial speech as set forth in *Comprehensive Accounting Services Company v. The Maryland State Board of Public Accountancy*, 284 Md. 474 (1979). Because, in any event, the questioned provision[s] are severable from the remaining provisions of House Bill 766, the bill can be signed into law. In the meantime, we [will further research this] issue [and address it more fully] in a separate letter . . . to you . . ." Bill Review Letter (H.B. 766/H.B. 948) from Stephen H. Sachs, Attorney General, to Harry Hughes, Governor (April 29, 1981).

The purpose of this Opinion is to advise you of the results of that research, and why we believe those provisions of Chapter 236 (House Bill 766) to be unconstitutional.

I

Regulation of Commercial Speech

In *Comprehensive Accounting Services Co. v. State Board of*

*Public Accountancy*, 284 Md. 474 (1979), the Court of Appeals considered the constitutionality of a statute regulating the practice of public accounting in Maryland. The statute in question provided for the certification, rather than the licensure, of public accountants. The statute did not, however, define the "practice of public accounting".

Among other provisions, the accountancy statute provided that a noncertified accountant could not "hold himself or herself out to the public as 'accountant' or 'auditor' in connection with his own or any other name, nor describe or designate the services offered or performed by him or it as accounting or auditing, with or without any other designation or description". Noncertified accountants were permitted to render a number of "public bookkeeping and tax services" as long as they did not claim to have made an "audit" or "examination" or did not furnish written certificates or opinions of the correctness of information prepared or examined.

The Court of Appeals acknowledged the right of the State to regulate the practice of public accounting, but it found that the complete ban on the use of the term "accounting" violated the First Amendment rights of noncertified accountants—persons who, "although permitted to engage in simple accounting services under the statute, nevertheless were deprived from describing these services to the public as 'accounting'." The Court held as follows:

Because the free flow of truthful information is protected by the first amendment, the courts require remedial relief for proved deceptions to be as narrow as possible.

To prevent the possibility of public confusion and deception, the legislature cannot consistently with the first amendment choose the most drastic remedy—the complete suppression of the use of certain words to describe the lawful activity of non-certified accountants." 284 Md. at 488-89.

## H

### Chapter 236

Chapter 236 of the 1976 House Bill 765 was enacted, the purpose of which was to amend the accountancy statute.

prohibited persons not certified by the State from utilizing certain words to describe their practice; namely, "psychology", "psychological", or "psychologist". The "practice of psychology" was not defined in the Act. The rationale of *Comprehensive Accounting* strongly suggests, therefore, that the prohibition in the Psychologists Certification Act against the use of these terms was unconstitutional, because the State cannot forbid altogether the truthful description of activities that it permits.

Chapter 236 operates to change the governing statute—now codified at Title 16 of the Health Occupations Article ("HO" Article)—from one of certification to one of licensure. It adds definitions of the terms "practice psychology", "psychologist", "psychological methods", "psychological principles" and "psychological procedures". In addition, it adds a new section, HO §16-301(a), to provide:

"Except as otherwise provided in this section, an individual shall be licensed by the [State] Board of Examiners of Psychologists) before the individual may practice psychology in this State."

Because Chapter 236 changes the regulatory scheme for psychologists—by prohibiting the practice of psychology by unlicensed persons, rather than merely restricting the use of certain terminology by uncertified persons—potentially impermissible restrictions on commercial speech are largely avoided. For example, HO §16-102(a) retains the general prohibition against the use of certain terminology:

"Unless authorized or permitted to do so by this title, a person may not use as a title or describe the services the person provides by use of the words 'psychological', 'psychologist', or 'psychology'."

Nevertheless, because the effect of this section is to prohibit the use of these terms by persons not permitted to practice psychology in the first instance, the section is constitutional.

However, one section of the new law does present a constitutional problem. Under HO §16-102(b)(2), certain individuals may continue to provide services within the standards of their professions without running afoul of the licensing provisions of the statute. Specifically, an individual who is a member of a "recognized profession" as defined by HO

§16-102(a), may "provide services consistent with the training and ethical standards of the individual's profession" - but only as long as the individual does not "use[ ] as a title or describe[ ] the services the individual provides by use of the words 'psychological', 'psychologist', or 'psychology'".

In essence, these provisions permit certain persons—even though unlicensed—to perform services that might constitute the "practice of psychology", as defined. At the same time, however, these provisions restrict those same persons from using terms that legitimately describe those services. For example, even persons having master's or doctoral degrees in psychology are prohibited by the statute from using the terms "psychological", "psychologist", or "psychology".

We believe that such restrictions are unconstitutional. In fact in the holding of *Comprehensive Accounting* is the requirement that the General Assembly may not, on the one hand, permit an individual to perform a function and, on the other hand, prohibit that same individual from using appropriate terminology to describe that function.

### III

#### Conclusion

In summary, it is our opinion that the prohibition in HO

<sup>1</sup> HO §16-102(a) defines a "recognized profession" as one represented by a national association that:

(1) was incorporated on or before January 1, 1981;

(2) has a code of ethics that governs the conduct of its membership; and

(3) requires for regular membership:

(i) a master's or doctoral degree in psychology, mental health, counseling, personnel and guidance, divinity, marriage and family therapy, or family and community development from an accredited college or university; and

(ii) at least 2 years training or its equivalent under the supervision of a regular member in good standing of the association, a licensed physician or a licensed or certified psychologist.

§16-102(b) against members of certain "recognized professions" from using the terms "psychological", "psychologist", or "psychology" to describe psychological services lawfully performed by them is unconstitutional and may not be enforced. Of course, because this provision does not affect other sections of the Maryland Psychologists Act, it is severable and does not render the remainder of the Act unenforceable.

STEPHEN H. SACHS, *Attorney General*

NANCY G. FRAMM, *Assistant Attorney General*

AVERY AISENSTARK

*Principal Counsel*

*Opinions and Advice*

*Editor's Note:* The preceding Opinion was originally written as a supplementary bill review letter. Because of its significance, however, it is published here, after some minor editing, in a revised format.

**TESTIMONY SB 379 SOCIAL WORK LICENSURE.pdf**

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Position: INFO

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1/24/2025

Finance Committee

Senator Pamela Beidle, Chair, Sponsors, and Members of the Committee

3 East Miller Senate Office Building

Annapolis, Maryland 21401

Bill: SB-379 - State **Board of Social Work Examiners – Membership and Examination Requirements**

**Position: Informative Information**

Dear Chairman Senator Feldman, and Member of the Committee:

Disclaimer: The opinions expressed are my own and do not in any manner represent the views or opinions of any other person, organization public or private, or any agency public or private or governmental agency or private, or not for profit corporation.

The Bachelors' level and non-clinical Macro level of licensure was originally enacted 50 plus years ago because of gross misconduct and negligence affecting the public made by unlicensed case workers, supervisors, and management primarily within the Departments Human Recourses and Local Departments of Social Services, and private contractors affiliated with governmental agencies (not unlike the issues which affected juvenile detention facilities (and resultant lawsuits). In most cases, the issues were related to children being removed from homes, placement in foster care, and alleged child abuse and neglect. Further, there were issues related to home visits, benefits, and other issues.

Resultant of these issues and others, Legislators determined the best method of indirectly managing the employer was to license the employee, (similar to requiring a trucking company to require commercial vehicle drivers to have a valid Commercial Drivers License) in this case the Social Worker. Public Agencies were then required to have employment positions which require Licensed Social Workers. **If licensure is not required or the standards of licensure are minimal and subjective by alterative means, will Agencies maintain accountability?**

**This legislation is not needed.** The categories of licensure impacted by this proposed legislation affects licensee's with Title Protection only. These, licensees' have no statutory or regulatory authority to engage in any restrictive (protected) actions, within their Scope of Practice, which an unlicensed person

may not engage in. The affected essential Scope of Practice authorized by the Health Occupations Article Title 19 is 100% fungible (interchangeable) with any unlicensed person ( except for the LCSW-C).

Further, there is no restriction on any person indentifying his/her self by an academic Title without licensure **or use the generic term “social worker”** ; the person may place a BSW or MSW, etc. after their signature. The person may hold their self out as a social worker, but not as a Licensed Social Worker. For example, only Psychologists who engage in Clinical Psychology must be licensed (to provide an evaluation, diagnosis, and treatment of persons’). A Research or Social Psychologist (need not by licensed and) simply places MA. or Ph.D after their signature and, state “I have a degree in Psychology”. The same holds for other professions such as an attorney who holds a JD degree but did not pass the Bar Exam. See AG Opinion dated July 7, 1981 attached.

In fact, in my appearances in Court, as an expert witness, the employees of the Department of Human Services –Local Departments of Social Services, on the witness stand, identify themselves as Social Workers. Upon cross examination, they admit not being licensed; the duties are the same, and interchange clients and all functions of their employment positions with Licensed Social Workers. The only difference is the Job Position Title and perhaps one pay grade. Permitting easy alternative methods for licensure will allow job applicants to use the Title “licensed” for designated job positions. But, most employees of public agencies are not licensed and need not be. Employers prefer non licensed employees as it poses less liability as standards of practice are not as enforceable.

**If SB-379 passes, next there will be an attempt to reduce competency standards for the Licensed Certified Clinical Social Worker (LCSW-C). This is unacceptable.**

The examination should be amended to be factually based, and objective, based upon Maryland and Federal laws and regulations, and content concerning human behavior. It should not be subjectively based on values. Educational experiences and studies in college or graduate schools may emphasize values but that is not the same as competency required engage in practice. There is a difference between values emphasized in education and competency to engage in practice designed to protect the public.

For example, without going into detail about other profession and trade examinations, simply consider the written test requirements to operate a motor vehicle. Either you have gained basic knowledge or not. A written test is required which is consistent across all applicants regardless of race, economic or social background, religion, or culture. The purpose of requiring basic competency testing is to protect the public.

Sincerely,

Electronically signed

Arthur Flax, LCSW-C, LCPC, LCADC

State of Maryland Licensed Certified Social Worker- Clinical; Licensed Clinical Alcohol Drug Counselor, DHMH; Evaluator for the Workers Compensation Commission; Licensed Health Care Provider, HG-8-403 (HB-1510 enrolled bill -2014) in compliance with DHMH Behavioral Health Integration enacted statutes and regulations. Direct Pay Non-Attorney Advocate approved by the Social Security Administration