



Wes Moore, Governor · Aruna Miller, Lt. Governor · Ryan Moran, DrPH, MHSA, Acting Secretary

Maryland Board of Social Work Examiners  
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**2025 SESSION  
POSITION PAPER**

**BILL NO: HB 1521**  
**COMMITTEE: Health and Government Operations**  
**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 HB 1521 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 bachelor's 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. BSWE is the ONLY board with a proposal to remove such an exam.

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 behavioral health services to individuals, couples, families, and children in a variety of settings. This includes correctional settings which have an overrepresentation of people of color and people with preexisting mental illnesses. When standards are lowered for social workers, we not only devalue the profession; we devalue our clients.

And despite the continued claim that removing the exam will address the behavioral health staffing shortages in the state, no other behavioral health professionals are being targeted for exam removal. In fact, both the Board of Professional Counselors and the Board of Psychology require a national competency exam and a state law exam for licensure.

<https://dsd.maryland.gov/regulations/Pages/10.36.01.06.aspx>

<https://dsd.maryland.gov/regulations/Pages/10.58.12.04.aspx>

Additionally, the long-term consequences for salaries and reimbursement rates must be considered. Within the state system, there is an example of an employee with an LCPC license being paid more than an LCSW-C. The same master's level education, supervised experience, and passing an exam. See two classifications below from the MD Department of Corrections:

<https://www.jobapscloud.com/MD/specs/classspecdisplay.asp?ClassNumber=004811&R1=undefined&R3=undefined>

<https://www.jobapscloud.com/MD/specs/classspecdisplay.asp?ClassNumber=002005&R1=undefined&R3=undefined>

There's a two-grade difference. What will happen if qualifications for social workers are lowered? HB1521 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 impact of removing the exam. In particular, the impact on complaints against social workers from the public.

In fact, Joel L. Rubin, Executive Director of the Illinois Chapter of the National Association of Social Workers (NASW), noted at the end of his presentation that further research was needed to track data related to complaints in the state. On page 37 of the report, the following information was reported on the total number of sanctions per year in Illinois.

- o 2019 – 4
- o 2020 – NA
- o 2021 – 1
- o 2022 – 2
- o 2023 – 2
- o 2024 – 4

That data seems unclear; it is difficult to find Public Sanction Orders on the Illinois Board of Social Work website. Additionally, looking at the posting of meeting minutes, it appears they haven't held an open session meeting since 2021! This raises concerns about public impact and the overall transparency of the Board as to that impact.

<https://idfpr.illinois.gov/profs/boards/swork.html>

The mission of BSWE is to protect Maryland citizens from incompetent social work practice. As a reminder, here is a link to Public Orders against Maryland Social Workers:

<https://health.maryland.gov/bswe/Pages/PublicOrders.aspx> Please note, our Board often reviews 10 to 20 complaints against social workers PER MONTH.

Supporters of removing the exam will say “there is no evidence that removing the exam jeopardizes public safety.” Perhaps, but most states aren't taking that risk. On page 35 of the Workgroup Final Report, there is a data chart that shows of 42 jurisdictions, 37 still use the exam for the bachelor's level – that is 88%. For the master's level, of 50 jurisdictions – 40 or 80% still use the ASWB exam. Do we want Maryland to be in the bottom 20%? Or do we want Maryland to lead the way in implementing new and better ways of reducing barriers and increasing exam passage rates?

Recommendations from BSWE regarding reducing testing barriers were voted on favorably by a majority of the Workgroup members. 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 of multiple failures rather than just toss the exam. BSWE asks that it be given the ability to issue waivers or design and implement alternative pathways to licensure. The Board has heard from many licensed social workers who support such options.

Because in the end, by discontinuing the exam requirement –we are telling this group – the over 19,000 currently licensed social workers in Maryland who have already passed an exam - 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 respectfully requests a vote of favorable with the amendments stated in this testimony on HB 1521.

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.*