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Dear Chair Beidle and Members of the Senate Finance Committee:

I respectfully request a favorable report on SB18, along with consideration of several targeted amendments that would strengthen the bill's effectiveness and ensure consistent implementation.

Maryland is experiencing a well-documented behavioral health workforce shortage alongside rising demand for mental health services. At the same time, the state continues to educate and graduate qualified professionals who are not entering or are leaving the licensed workforce. According to the *Maryland Behavioral Health Workforce Assessment*, nearly 70 percent of Master of Social Work and Clinical and Counseling Psychology graduates from Maryland universities since 2014 were working outside their field, employed out of state, or not working one year after degree completion (p. 4). The report further estimates that Maryland requires an additional 2,675 social workers in behavioral health settings alone to meet current demand (p. 31).

These data strongly suggest that unnecessary barriers to licensure are limiting Maryland's ability to fully utilize its trained workforce. SB18 offers a practical, evidence-informed response to this challenge.

I offer this perspective as an experienced social work educator with more than 20 years of experience in higher education and over 10 years of teaching at Historically Black Colleges and Universities in the State of Maryland. In this role, I have worked closely with students preparing to enter the behavioral health workforce and with accredited social work programs charged with ensuring readiness for professional practice.

Social work programs accredited by the Council on Social Work Education (CSWE) are required to deliver a competency-based education that integrates classroom instruction with supervised field education. Students acquire practical, hands-on experience while earning their degrees and are assessed on demonstrated competence across required practice domains. Graduates of these programs are, by design, prepared to enter professional positions upon degree completion.

Despite this rigorous preparation, it has been well documented that exam-based licensure constitutes a significant barrier for many otherwise qualified social workers seeking to enter or remain in the workforce. This disconnect between competency-based education and examination-based licensure undermines workforce development efforts and disproportionately delays or excludes capable practitioners from serving Maryland communities.

Alternative, non-examination pathways to licensure at the LBSW and LMSW levels have already been implemented successfully in other jurisdictions—most notably Washington, DC, through its Educational Pathway. Within 72 days of implementation, DC reported:

- an 18 percent increase in LGSW (LMSW-equivalent) licenses;
- an average licensee age of 40;
- 86 percent of licensees identifying as Black; and
- 58 percent of licensees residing in Maryland.

Applied to Maryland, a comparable increase would result in more than 1,000 additional social workers entering the workforce.

Importantly, states that have eliminated or supplemented the master’s-level examination requirement have not experienced increases in disciplinary actions or threats to public protection. This approach maintains professional standards while removing a costly barrier that has not been shown to predict practice competence or improve safety outcomes.

As the Committee evaluates SB18, it is essential that the discussion remain grounded in empirical evidence and statutory authority rather than assumption. Assertions that standardized examinations are necessary to ensure public safety are not supported by evidence demonstrating a correlation between exam passage and professional competence. At the same time, the Association of Social Work Boards (ASWB) has implemented repeated and substantial changes to the examination—changes described as both easing passage rates and maintaining equivalent validity to prior versions. These claims warrant careful scrutiny.

Further, ASWB has not made key reliability and validity data available for independent review, limiting the ability of regulators, practitioners, and policymakers to meaningfully evaluate the exam’s effectiveness. Given ASWB’s financial reliance on exam administration, it is reasonable and appropriate for policymakers to assess these claims independently.

Concerns have also been raised regarding SB18’s impact on Maryland’s participation in the Interstate Social Work Licensure Compact. The Compact language is explicit: *“Nothing in this Compact shall affect the requirements established by a Member State for the issuance of a Single State License.”* Under SB18, examination-based licensure remains fully available. Only licensees who elect the practice-based pathway would be ineligible for Compact privileges.

It is also important to note that many licensed social workers do not rely on interstate portability. For those who do, a practice-based pathway allows qualified professionals to enter the workforce, earn income, and complete supervised practice while preparing for the examination—rather than being excluded from practice entirely.

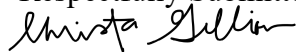
SB18 represents a balanced and pragmatic approach. It preserves examination-based licensure while establishing a practice-based alternative that recognizes demonstrated competence, addresses workforce shortages, and expands access to care for Maryland residents without compromising public protection.

To further strengthen the bill and promote clear, consistent implementation, I respectfully request consideration of the following amendments:

- Rename the alternative pathway “**Practice-Based Licensure**” to accurately reflect that it confers full professional rights and responsibilities.
- Allow up to **four years** to complete the required 1,500 hours of supervised practice, recognizing common life circumstances while maintaining the total supervision requirement.
- Ensure that **supervisor responsibilities are identical** across both practice-based and examination pathways.
- Include explicit language allowing supervised practice hours accrued under this pathway to **count toward future independent licensure** requirements.
- Maintain **confidentiality of pathway status** between the licensee and the Board.
- Require **annual reporting by the Board of Social Work Examiners** on licensure numbers and disciplinary outcomes by pathway to support transparent, data-driven evaluation.

Thank you for your consideration of SB18 and for your continued commitment to strengthening Maryland’s behavioral health workforce. I respectfully urge a favorable report.

Respectfully Submitted,



Christa Gilliam