

Dear Members of the Committee,

My name is Bynia Reed, and I respectfully submit this written testimony in opposition to Senate Bill 18. I am speaking on my own behalf as an African American woman and as a professional who has served as a consultant with the Association of Social Work Boards (ASWB) for the past 19 years.

Over the course of my work with ASWB, I have served in multiple roles, including Item Writer, Examination Committee member, Examination Committee Co-Chair, Consultant to Item Writers, and currently in Form Review. I have worked directly within the licensure examination process and have deep, firsthand knowledge of how the social work licensing exams are developed, reviewed, validated, and maintained.

I want to be clear at the outset. I share the concern about racial disparities in social work exam pass rates. The data released by ASWB several years ago was troubling and deserved serious attention. I am fully aware of those statistics. However, eliminating the bachelor's and master's level licensing exams is not the solution. SB 18 misunderstands the problem and, in doing so, creates new and dangerous risks for the public, the profession, and the very communities it claims to help.

The social work licensing exam is the only uniform, objective measure of minimum competency across applicants. Education programs and field placements vary widely in rigor, resources, supervision quality, and expectations. The exam is the single standardized tool that ensures a baseline level of knowledge, judgment, and ethical decision-making for entry into practice. Removing it weakens public protection and undermines confidence in licensure.

As a Black woman who has worked inside the exam development process for almost 2 decades, I find the underlying premise of this bill deeply concerning. The suggestion that the exam itself is inherently biased or exclusionary erases the extraordinary diversity of the professionals who create it. Item writers and exam committee members are intentionally diverse across race, ethnicity, gender, geography, practice settings, and lived experience. They are not employees of ASWB. Most are volunteers. Some are paid consultants. All are bound by rigorous psychometric standards and conflict-of-interest protections. The idea that the exam is written by or for a single dominant group is simply false.

It is also critical to distinguish between psychometric bias and broader cultural or structural inequities. Psychometric bias refers to flaws in test design that unfairly advantage or disadvantage certain groups. The social work exam is structurally analyzed for this. The exam contains scored and non-scored "pre-test" items. Scored items have already been vetted against any type of bias. For pre-test or non-scored items on the exam,

the Exam Committee receives psychometric data on each item's performance using a 3rd party analysis. Any item showing any type of bias are immediately deleted and are never used on the exam as a scored item. Cultural and structural inequities, however, arise long before a test is taken. They stem from unequal K-12 education, disparities in undergraduate and graduate preparation, unpaid or low-paid field placements, financial strain, and lack of access to quality supervision, mentorship, and exam prep. The exam does not create these inequities. It reflects them. The exam is a thermometer, not the disease.

SB 18 attempts to address inequity by removing the thermometer instead of treating the illness.

The alternative pathway proposed in this bill introduces its own serious barriers and risks. Requiring 1,500 hours of supervision as a substitute for an exam does not remove obstacles. It increases them. Supervision is costly. Many social workers must pay out of pocket for supervision, sometimes up to \$100+ per hour of supervision. Access is uneven, especially for those without reliable transportation, flexible work schedules, or professional networks. Supervision quality also varies significantly, and supervision is inherently subjective. It is not a reliable or uniform measure of minimum competence. Replacing an objective exam with supervision alone shifts risk onto supervisors, employers, and ultimately the public.

This bill also deprofessionalizes social work. Removing exam-based licensure sends a message that social work requires less rigor than other health and behavioral health professions. Physicians, nurses, psychologists, and counselors are all required to demonstrate competency through standardized examinations because they serve the public and work with vulnerable populations. Social workers do the same. I would ask plainly. Would you want a social worker assisting your elderly parent, your child with special needs, or a family in crisis who has never demonstrated minimum competency through an independent assessment?

SB 18 creates a bifurcated licensure system that will confuse employers, regulators, and the public. It threatens Maryland's participation in the Social Work Licensure Compact, limiting license portability and long-term earning potential for Maryland social workers. It will also affect insurance reimbursement (meaning social workers who have not taken and passed an exam cannot get paid by public or private insurance), professional credibility, expert witness qualification, and liability coverage. These are real downstream consequences that disproportionately harm early-career professionals and social workers of color.

Most concerning of all, this bill risks reinforcing the very inequities it seeks to address. Lowering standards for a profession that disproportionately serves marginalized communities sends a troubling message about whose care deserves rigor and protection. That is not equity. That is abandonment.

There are real, evidence-based solutions to workforce shortages and racial disparities in licensure outcomes. Paid field placements, supervision stipends, pipeline programs, exam preparation support, and employer incentives strengthen the workforce without sacrificing public protection. SB 18 does none of these things.

For these reasons, I urge the Committee to oppose Senate Bill 18. This bill is risky, misguided, and ultimately harmful. It lowers standards, increases barriers, and places vulnerable populations at greater risk. Maryland's social work licensure system should be strengthened, not weakened.

Thank you for the opportunity to submit this testimony and for your thoughtful consideration.

Respectfully submitted,

Bynia Reed, LCSW-C