

Chair Bagnall, Vice Chair Cullison, and Members of the Senate Finance Committee:

My name is Susanna Sung, and I am a Licensed Certified Social Worker-Clinical residing in Columbia, Maryland, in Howard County. I submit this written testimony in strong opposition to Maryland House Bill 769 (HB 769).

HB 769 would weaken Maryland's social work licensing standards by reducing or removing the only uniform, objective assessment of competence to practice, and the social work licensing examination. If enacted, this bill would allow individuals to practice at the bachelor's and/or master's level without demonstrating minimum competency through a standardized exam, putting public protection at risk and undermining the professional standing of social workers across the state.

Social work education programs and field placements vary widely. Without a standardized licensing exam, there is no consistent way to verify a minimum baseline of competence across applicants. In my 29 years as a social worker and social work supervisor, I have seen the wide range of quality in supervision, and I believe relying only on supervision hours for licensure places vulnerable populations at risk. Relying only on being officially supervised as the benchmark for competence is problematic because it introduces additional bias and barriers into the process. Unlike a standardized exam, supervision is inherently subjective and varies widely by supervisor, workplace culture, and setting. Evaluations may be influenced, intentionally or not, by implicit bias, power dynamics, or inconsistent expectations, with no uniform benchmark for fairness.

The opportunities and access for supervision also vary depending on someone's access to transportation, time availability when so many people also have caretaking duties or other commitments, and resources (many social workers are paying \$50-\$100 an hour for supervision for their LCSW-C and this model will likely be replicated for this proposal, resulting in costs far exceeding the cost of the exam). Some supervisees receive robust mentorship, while others receive minimal oversight focused on administrative sign-off, not competency development. Relying on subjective experiences of supervision does not protect the public. HB 769 shifts licensure decisions away from objective standards and into individualized gatekeeping, which can disadvantage historically marginalized applicants.

Weakening licensure standards will have real-world consequences. Insurance reimbursement, wages, and professional recognition are closely tied to the strength and credibility of licensure requirements. Diluting those standards devalues Maryland social work licenses and threatens parity with other behavioral health professions that maintain exam-based licensure.

Eliminating the exam also jeopardizes Maryland's ability to fully participate in the Social Work Licensure Compact, limiting career mobility for social workers and reducing access to care for clients, particularly in underserved and rural areas.

Access to care is also an issue of a workforce shortage. To be clear, the exam is not the reason for a shortage of professional social workers. Current positions for social workers who do the difficult and meaningful work of working in crisis/suicide intervention, intimate partner violence, and substance use disorders are currently offering hourly wages of \$17-\$25. Low wages are the primary reason for a shortage of social workers. De-professionalizing the social work profession will only drive wages lower.

I have contributed to the licensing exams for 25 years as a volunteer and consultant. It is important to note the diversity in practice settings and experiences as well as the diversity of identities and culture of all the social workers who work on the exams. It is also important to note the strength of rigorous psychometric testing and analysis performed on the questions and the exams, and they demonstrate reliability and validity to test the subject matter. A great deal of work is put into guarding against psychometric bias. There is a big difference between psychometric bias and cultural bias. I believe the pass rate disparities reflect the biases and disparities inherent in our systems, from unequal resources and access in communities, our K-12 educational system, and other systems. Eliminating an exam for professional licensure shifts the focus to increasing risk while not addressing the real problems in pass rate discrepancies.

Maryland's social work licensure system exists to protect the public and uphold the integrity of the profession. HB 769 moves the state in the wrong direction by lowering standards rather than strengthening the workforce through meaningful, evidence-based solutions. HB 769 will weaken public protection.

For these reasons, I respectfully urge the Committee to oppose House Bill 769.

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

Respectfully submitted,

Susanna Sung, LCSW-C