

**To:** Members of the House Health Occupations Subcommittee and Senate Finance Committee  
**Re:** Opposition to HB769/SB0018 As Amended

Dear Members of the House Health Occupations Subcommittee and Senate Finance Committee,

We write as members of the Maryland Workgroup for Social Work Licensure — a body convened by this legislature in 2023 to examine barriers in the Social Work licensure process and develop evidence-based recommendations for reform.

After months of deliberation, review of workforce data, and testimony from practitioners, educators, employers, and affected Social Workers across Maryland, the Workgroup voted 19-4 to recommend the creation of genuine alternative pathways to licensure grounded in supervised practice. That recommendation reflected the clear weight of evidence: that the current examination structure produces racially disparate outcomes, has never been validated as a predictor of competent practice, and is contributing directly to Maryland's behavioral health workforce crisis.

We are writing because the amended version of HB769/SB0018 does not reflect those recommendations.

As amended, the bill creates two new license categories. The provisional license established under §19-309.2 requires passage of the ASWB examination as the only pathway to full licensure. It cannot be renewed. It expires in 12 to 24 months at the Board's discretion. A Social Worker who completes that entire period of supervised practice will still lose their license if they cannot pass an exam that Maryland's own data shows repeat candidates pass at a rate of just 23.3%. There is no alternative pathway under this track.

The conditional license under the amended §19-309.1 does include a supervised hours option: 1,500 hours verified by a Board-approved supervisor. We acknowledge that provision. However, those hours only qualify when evaluated in accordance with standards set in consultation with a CSWE-accredited institution offering both a baccalaureate and a master's degree. That institutional requirement narrows access in ways that will disproportionately affect the Social Workers this reform was meant to reach. Additionally, neither license qualifies the holder for the interstate Social Work Licensure Compact, limiting portability at a time when Maryland is already losing the majority of its Maryland-educated Social Workers to other states.

We did not volunteer our time to this process to see its recommendations set aside in favor of a structure that entrenches the status quo.

We respectfully urge this body to issue an unfavorable report on HB769/SB0018 as amended. We further urge the General Assembly to return next session with legislation that genuinely reflects the Workgroup's recommendations: a practice-based pathway requiring supervised hours as a true alternative to examination, without the examination requirement as a terminal condition of licensure.

Maryland's communities — and the Social Workers who serve them — deserve reform that is real.

Respectfully submitted,

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