

Dear Chair Bagnall and Members of the House Health Committee:

As a Maryland resident, I respectfully request a favorable report on HB769, along with several amendments that would strengthen the bill's effectiveness and ensure consistent implementation.

Maryland is currently facing both a mental health workforce shortage and growing demand for behavioral health services. At the same time, Maryland continues to educate and graduate qualified professionals who are not entering or remaining in the licensed workforce. I am one of these social workers: I have been licensed for almost 15 years in Washington, DC.

The Behavioral Health Workforce Assessment data suggest that unnecessary barriers to licensure are limiting the state's ability to fully utilize its trained workforce. **HB769 offers a practical and evidence-based solution.**

Providing an alternative, non-exam pathway to licensure at the LBSW and LMSW levels has already been implemented successfully in other states and, notably, Washington, DC, through their "[Educational Pathway](#)." In just 72 days, DC reported:

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

In Maryland, the same rate of increase would equate to more than 1,000 additional social workers entering the workforce.

I am proof that when social workers leave the state to begin their careers, they often do not return. Although I have been a lifelong Maryland resident, I have spent the past 15 years building my career under a Washington, DC license. With DC's adoption of an alternative pathway, Maryland now risks losing a significant number of newly trained social workers to neighboring jurisdictions; these losses are unlikely to be recouped. **As both a social worker and a member of a family that has relied on Maryland social workers, this is deeply troubling.** The time to implement an alternative pathway is now.

My experience shows that **employers are eager to hire social workers licensed through alternative pathways.** As a new clinical supervisor at a community mental health counseling center, I rely heavily on part-time contractors to deliver clinically appropriate, culturally responsive care. We currently have a waitlist for services, and the alternative pathway has opened access to an entirely new pool of qualified social workers for me to hire. I have found it difficult to hire these clinicians because they are being actively recruited by many similar organizations. These social workers bring life experience, years of practice, and deep understanding of the communities we serve, making them highly desirable hires. I am eager to add them to my contractor roster as soon as possible.

Importantly, the states that have removed or supplemented the Master's level exam requirement have not experienced increases in disciplinary actions or public protection concerns. This approach maintains standards while removing a costly barrier that has not been shown to predict professional competence or protect the public.

As the Committee evaluates HB769, it is important to ground the discussion in evidence and statutory authority rather than assumption. Assertions that standardized examinations are necessary to ensure public safety have not been supported by empirical evidence demonstrating a correlation between exam passage and practice competence or improved safety outcomes. At the same time, the Association of Social Work Boards (ASWB) has made [repeated](#) and [substantial changes](#) to the examination itself—changes that are described as both easing passage rates and maintaining equivalent validity to prior versions. These positions are difficult to reconcile.

Further, ASWB has not made key reliability and validity data available for independent review, limiting the ability of regulators, practitioners, and policymakers to meaningfully assess the claims being made about the exam's effectiveness. Given ASWB's [financial reliance](#) on exam administration, it is reasonable and appropriate for policymakers to weigh these claims carefully and independently.

Questions have also been raised regarding whether HB769 would affect Maryland's participation in the Interstate Social Work Licensure Compact. The [Compact language](#) is clear that member states retain full authority over their licensure pathways: *"Nothing in this Compact shall affect the requirements established by a Member State for the issuance of a Single State License."*

Under HB769, examination-based licensure remains available, and only individual licensees who choose not to pursue the exam pathway would be ineligible for Compact privileges.

Importantly, 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 altogether.

HB769 reflects 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 ensure clear, consistent implementation, I respectfully request consideration of the following amendments:

- Rename the alternative pathway “Practice-Based Licensure” to accurately reflect that it confers all full professional rights and responsibilities of social work licensure.
- Allow up to four years to complete the required 1,500 hours of supervised practice. This flexibility recognizes common life circumstances that may temporarily affect hours worked while maintaining the total supervision requirement.
- Ensure supervisor responsibilities are identical for both practice-based and examination pathways.
- Specific language that allows supervised practice hours accrued during this period to count toward future independent licensure requirements.
- Maintain confidentiality of pathway status between the licensee and the Board.
- Require annual BSWE reporting on licensure numbers and disciplinary outcomes by pathway to support transparent, data-driven evaluation of the policy’s impact.

Thank you for your consideration of HB769 and for your continued commitment to building Maryland’s behavioral health workforce. I respectfully urge a favorable report.

Sincerely,
Rachel Doyle, LICSW
District 21 Resident