

Frank Williams, Ph.D.
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February 16th, 2026

The Honorable Heather Bagnall
House Health Committee
240 Taylor House Office Building
Annapolis, Maryland 21401

Re: Testifying in Opposition to HB 769 “State Board of Social Work Examiners - Conditional License to Practice Social Work – Revisions”

Chair Bagnall, Vice Chair Cullison, and Distinguished Committee Members:

Please accept my written testimony in opposition to House Bill 769. My name is Frank Willams. I am a psychometrician and Baltimore City resident. I am also a director at Psychological Services, Inc. (PSI). PSI is a long-established testing company that develops and delivers high-stakes licensure exams using rigorous science, and modern technology. I am a psychometrician who provides consultation services to the Association of Social Work Boards (ASWB) examination program.

On behalf of PSI and the testing industry, thank you for the opportunity to share my expert opinion on a matter of great importance to ASWB with respect to test development. I was involved in ASWB’s efforts last year to evaluate the use of exam modules as a new way of administering the test. I am writing to share the meticulous decision-making process behind modular examinations and why I ultimately recommended against this approach.

While I understand the perspective that views the licensure exam as a barrier to entry, eliminating the exam would ultimately cause more harm than benefit. The exam exists to identify social workers who meet a minimum standard of competence in areas of critical knowledge. It serves as a professional marker of competence defined by practicing social workers, rather than as a mandate imposed by ASWB staff. Removing the exam would likely increase the number of practicing social workers; however, it would also increase the number of practitioners with gaps in essential knowledge, thereby expanding the proportion of the public exposed to less competent social work services.

At the time of my recommendation against the use of modules, I was a Managing Psychometrician at PSI, now Director. Based on my experience in assessment, test takers typically demonstrate strong performance in one—and occasionally two—domains, while performing only marginally in others. Introducing cut scores at the domain level would therefore be expected to substantially reduce overall pass rates. In addition, score reliability is a critical consideration, as it reflects the stability of test scores across administrations; higher reliability

indicates that a retester's score is unlikely to differ meaningfully from their original result if they do not increase their knowledge. The current version of the exam consists of 150 items and achieved a reliability coefficient exceeding 0.85, well above the NCCA accreditation standard of 0.80. Dividing the exam into three separate modules would reduce the average module length to approximately 50 items, making it difficult to maintain a reliability of 0.80.

Score reliability is especially important as it relates to the cut score. If there isn't high score reliability, a licensing organization cannot be certain whether a passing score represents true achievement of a minimum standard of competence or if it is an inflated, false positive. In order to protect the public, it would be necessary to increase the cut score to further ensure candidate's competence which would consequently decrease the passing rate.

The Human Resources Research Organization (HumRRO) analyzed score data from Clinical exam administrations to assess the potential outcomes of modularizing the exam. HumRRO's study supported this concern: among candidates who failed the exam, 11% passed two domains, 41% passed one domain, and 48% passed none of the domains. Reliability estimates for the domains ranged from 0.59 to 0.77, thereby not meeting the threshold. HumRRO also conducted subgroup analyses, which indicated that the Latino passing rate was 62% of the White passing rate, while the Black passing rate was 41% of the White passing rate.

A number of changes will take place when the 2026 social work licensing exams are introduced later this year. In addition to the shift from four domains to three, the number of scored items was reduced from 150 to 110. This change was intended to improve the overall test-taking experience while still maintaining a high level of exam reliability. The proportion of three-response (A-B-C) items will continue to increase as four-response (A-B-C-D) items are phased out. To better reflect the realities of social work practice, the cognitive demands of the exam will also continue to evolve, with fewer recall-based items and a greater emphasis on analysis and applied reasoning.

In closing, in social work exams, the question is not whether a system is perfect, but whether it is defensible, evidence-based, and accountable to the public. Any alternative that cannot meet equivalent psychometric rigor does not advance fairness. For this reason, I ask you to oppose House Bill 769.

Most respectfully,



Frank Williams, Ph.D., ICE-CCP
Director, Psychometrics, PSI, Inc.