

HB 769 - Unfavorable

My name is Joy J. Kim, an associate professor at Rutgers University School of Social Work. I want to briefly share some of my research findings on social work regulations in light of the proposed HB 769 in your state.

HB 769 allows an alternative pathway to full licensure for bachelor's and master's social workers, requiring 1,500 hours of supervised practice without passing a licensing exam. Given the inherent limitations of a single standardized assessment, as seen in most professional licensing exams, it may be understandable that an alternative is being explored in your state.

However, it is important to note that supervised practice in social work does not involve assessing supervisees' competence. According to Curran et al. (2025), who reviewed current practices in competence assessment in social work, no state requires a structured assessment of competence upon completion of supervisory hours. This was also confirmed by my recent survey of state social work licensing boards across the country. My research revealed that supervised practice is regulated with only modest rigor, and that no objective, standardized competence assessment is required nationwide. Many boards simply do not have the resources and capacities for rigorous regulations (Kim, under review).

Although HB 769 mandates the social work board to adopt specific regulations to monitor and govern the alternative pathway, including evaluation standards and reporting procedures, the proposal shifts the burden of ensuring competence assessment onto the boards, which may not be equipped with the resources and capacity (Kim, under review). Equally important, it may introduce subjective biases and conflicts of interest (among supervisors) into competence assessment (Curran et al., 2025).

Therefore, despite its good intentions, it may create a second-class social work workforce that is not subject to a uniform, national minimum competence assessment, the most essential element of professional licensure. It may negatively affect interstate practice mobility for some portion of the state's social work workforce under the Social Work Compact.

Furthermore, introducing non-standardized competence assessment may erode the social work licensing system over the long term, contributing to lower professional status, salaries, and compensation for the state workforce. There is also concern that replacing licensing exams with supervised practice may lower the social work profession's standing compared with other mental and behavioral health professions that require standardized exams for licensure. Diminishing professional status and compensation may even contribute to reducing the number of social work candidates in the state. Therefore, I hope you carefully consider the long-term implications of the bill.

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Reference

- Curran, L., Kim, J.J., & Joo, M.M. (2025). Promoting competence: Multistage conceptualization, empirical evidence, and current controversies on licensure to inform a future research agenda. *Journal of Social Work Education*, 1-16. <https://doi.org/10.1080/10437797.2024.2420091>
- Kim, J. J. (under review). How licensing boards regulate clinical supervision in social work: The role of regulatory rules and boards' capacities. DOI: [10.13140/RG.2.2.31925.74726](https://doi.org/10.13140/RG.2.2.31925.74726)