

**Workgroup for Social Work Requirement for Licensure
Final Report**

As Required by Senate Bill 871/Chapter 228 (2023)

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Executive Summary

Since the submission of the interim report, the Workgroup has convened six additional meetings to further its critical mission. During this time, the Workgroup engaged in additional presentations from members, as detailed later in this report, and enlisted the consultancy team of CMAG & Associates LLC to support the development of this final report. CMAG & Associates has played a key role in assisting with research efforts, including exploring alternative pathways to licensure and conducting research on the components of a bias analysis.

Discussions in the Workgroup meetings since the interim report have encompassed a range of critical topics, including strategies to reduce barriers to licensure, a detailed review of Maryland's licensure requirements, considerations for the unique needs of deaf and hard-of-hearing social workers, insights from the bias analysis, and evaluation of alternative pathways. Additionally, the Workgroup conducted a survey and gathered individual feedback from members to inform its recommendations on addressing the barriers identified. This collaborative and evidence-driven approach forms the foundation for the findings and recommendations presented in this final report.

Per Senate Bill 871 (SB 871)/Chapter 228 (2023), the Workgroup was charged to conduct a study to examine each type of license under the Maryland Social Workers Practice Act (Title 19 of the Health Occupations Article) by:

- (i) Conducting a bias analysis of the qualifications for each type of license;
- (ii) Determining whether each type of license is necessary;
- (iii) Identifying alternatives to examination requirements that may be used to assess an applicant's qualifications for each type of license;
- (iv) Considering examination testing options, including the development of a State-based competency examination, minimum requirements for a national examination to be approved for State applicants, utilization of ranges of examination scores, and other policies to ensure a bias-free examination;
- (v) Identifying barriers in addition to the examination that present challenges to licensure in the State; and
- (vi) Identifying the circumstances under which unlicensed individuals work in state and federal government positions as Social Workers.

On or before December 1, 2024, the Workgroup shall report to the Senate Finance Committee and the House Health and Government Operations Committee, in accordance with § 2-1257 of the State Government Article, on its:

- (i) Findings; and
- (ii) Recommendations to eliminate bias and make the process for licensing social workers in the State more fair, diverse, and efficient.

With the support of the Maryland Department of Health and the Workgroup, CMAG was tasked with the following:

- Research the states that have an alternative pathway in place or are in the process of discussing their path forward based on the ASWB Pass Rate Report.
- Research the components of conducting a Bias Analysis for standardized tests and provide information to assist the workgroup in developing a concrete plan for conducting the bias analysis.
- Participate in several workgroup-related meetings including MDH leadership Workgroup meetings and subgroup meetings for the purpose of the completion of the final report.
- Conduct a survey of all Workgroup members to allow them to identify which alternative pathways they believe would best benefit Maryland Social Workers. Workgroup members also had an opportunity to provide comments about their choices.
- Present findings of all research conducted in writing and during workgroup meetings.

Overall, the workgroup has developed a consensus for the recommendations provided in this report; however, the majority also agreed that there are more details and research needed in many of the Workgroup focus areas. This information is included in the recommendations section of this report.

Background

SB0871 Social Workers – Sunset Extension, Notification of Complete Application, and Workgroup on Social Worker Requirements for Licensure, sponsored by Senator Mary Washington, was approved by the Governor of Maryland – Chapter 228. In synopsis, SB0871 was enacted to continue the State Board of Social Work Examiners in accordance with the provisions of the Maryland Program Evaluation Act (sunset law) by extending to July 1, 2025, the statutory and regulatory authority of the Board, establishing the Workgroup on Social Worker Requirements for Licensure to make certain findings and recommendations regarding the licensure of Social Workers in the State; and generally relating to the State Board of Social Work Examiners and licensure requirements for Social Workers.

Per Section 2 of SB0871, it was further enacted that there is a Workgroup on Social Worker Requirements for Licensure. The Workgroup consists of the following members:

- One member of the Senate of Maryland who is a member of the Legislative Black Caucus, appointed by the President of the Senate;
- One member of the House of Delegates who is a member of the Legislative Black Caucus, appointed by the Speaker of the House;
- The Secretary of Health, or the Secretary’s designee; the Secretary of Human Services, or the Secretary’s designee;
- The Chair of the State Board of Social Work Examiners, or the Chair’s designee;
- The Chair of the Maryland Commission on Health Equity, or the Chair’s designee;
- The Executive Director of the State Board of Social Work Examiners, or the Executive Director’s designee;
- The Director of the Governor’s Office of the Deaf and Hard of Hearing, or the Director’s designee;

- One Social Worker who is deaf or Hard of hearing and is familiar with the licensing process for deaf and hard-of-hearing Social Workers designated by the Maryland Association of the Deaf;
- One representative of the NAACP Maryland State Conference, designated by the President of the NAACP Maryland State Conference;
- One representative of the Baltimore Legacy Chapter of the Association of Black Social Workers, designated by the Baltimore Legacy chapter of the Association of Black Social Workers;
- One member from the Greater Washington Society for Clinical Social Work, designated by the President of the Greater Washington Society for Clinical Social Work;
- Two representatives of the Association of Social Work Boards, designated by the President of the Association of Social Work Boards;
- The following members, appointed by the Governor; three Deans of Social Work from accredited Social Work master's programs serving the State, one of which shall be from a Historically Black College or University;
- Three representatives from nongovernmental social service organizations that primarily work to support Western Maryland, Central Maryland, and the Eastern Shore; and
- Two individuals who received a Master's Degree in Social Work within the immediately preceding 10 years and who have been negatively impacted by the examination requirement for licensure under Title 19 of the Health Occupations Article.
- The Governor shall designate the Chair of the Workgroup.

SB0871 was enacted as an emergency measure necessary for the immediate preservation of public health or safety and passed by a ye and nay vote supported by three-fifths of all the members elected to each of the two Houses of the General Assembly. Section 2 of this Act shall remain effective through June 30, 2025, and at the end of June 30, 2025, Section 2 of this Act, with no further action required by the General Assembly, shall be abrogated, and no further force and effect.

The Workgroup has met sixteen times through November 20, 2024. Business conducted at each meeting included a review of statutory mandates, formation of operational process, and briefings on topics that include the licensing process in the state of Maryland and surrounding jurisdictions, the exam and licensing processes for other professions, the ASWB exam, as well as from members of the Workgroup. Presenters and topics included:

- Judith L. Mounty, EdD, LCSW-C, LICSW, LSW
 - January 9, 2024: Deaf and Hard of Hearing Candidates for Social Work Licensure
- Stacey Hardy-Chandler, PhD, JD, LCSW, CEO of the Association of Social Work Boards
 - January 30, 2024: Maryland Workgroup Briefing, ASWB
- Jason A. Schwartz, MS, Director of Outreach, NCSBN (National Council of the State Board of Nursing)

- o January 30, 2024: Next Generation National Council Licensing Examination (NCLEX): An Inside Look
- Laura W. Groshong, LICSW, Director, Policy, and Practice, Clinical Social Work Association (CSWA),
 - o March 26, 2024: Social Work Compact: Development and Current Status
- Joel L. Rubin, MSW, LSW, ACSW, CAE, Executive Director of the Illinois Chapter of the National Association of Social Workers (NASW)
 - o April 30, 2024: Breaking Down Barriers to Social Work Licensure in Illinois
- Dr. Concetta Pucci, PhD, LICSW, Director of Undergraduate Field Education and Senior Lecturer, Social Work, School of Civic Leadership, Business, and Social Change, Gallaudet University
 - o June 25, 2024: ASWB Testing and Accommodations
- Karessa Proctor, BSW, MSW, Executive Director, Maryland National Association of Social Workers (NASW)
 - o June 25, 2024: NASW Updates
- Karen Richards, LSCW-C, Executive Director of the State Board of Social Work Examiners
 - o October 30, 2024: Board of Social Work Examiners Presentation
- Dr. Angela Gustus, CEO of CMAG & Associates LLC
 - o October 30, 2024: Alternative Pathways Introduction
 - o November 13, 2024: Alternative Pathways Survey Responses Report
 - o November 20, 2024: Alternative Pathways Decision

Per the requirements of the Bill, the Workgroup established the following subgroups to examine topics (which is not exhaustive):

- Policy - Board of Social Work, Disability and Accommodations and Requirements;
- Universities/Schools/Programs of Social Work – Curriculum, CSWE Requirements;
- Testing Barriers – Cost of Preparation, Exam Fees, Testing Locations, Concerns about testing barriers included the overall process for requesting accommodations, concerns about how candidates are treated, and the triggers for members of certain identity groups were identified; and
- Recommendations on Testing – Recommendations on continuing the use of the ASWB exam for LBSW and LMSW, Supervision, or Temporary Licensure.

The Workgroup on Social Worker Requirements for Licensure, authorized by SB0871, convened its first meeting on Tuesday, October 24, 2023, at the Maryland State House in Annapolis.

Per the Bill, the Workgroup was charged with reporting findings and recommendations and outlines and timelines in its preliminary and interim reports determining:

- (i) Whether to continue to use examinations developed by the Association of Social Work Boards (ASWB) as a requirement for a Bachelor Social Worker license or a Master Social Worker license;

- (ii) Whether to establish a temporary license for applicants for a Bachelor Social Worker license or Master Social Worker license who, except for passing the required examination, meet the education and experience requirements for licensure;
- (iii) How supervision may be provided to Bachelor Social Worker licenses and Master Social Worker licensees at no cost to licensees; and
- (iv.) If the Workgroup determines that the ASWB examination should not be used or that temporary licenses should be established, whether additional experience or education requirements are necessary;
- (v.) A timeline for phasing in any determinations made under item (i), (ii), (iii), or (iv) of this item; and
- (vi.) An outline and timeline for conducting the study required in subsection (h) of this section.

Due to unforeseen delays in identifying members and convening the Workgroup until October of 2023, several milestones of the Bill were not attained, including submission of a preliminary report of its findings and recommendations by September 1, 2023, which was instead submitted on December 31, 2023. The Interim Report, delayed from December 1, 2023, to May 31, 2024, contains a timeline for phasing in any determinations made pursuant to the findings of the preliminary report and an outline and timeline for conducting a specified study.

In October 2024, the Maryland Health Care Commission published the “Investing in Maryland's Behavioral Health Talent: A Needs Assessment to Inform the Design of the Behavioral Health Workforce Investment Fund established by the Maryland legislature through Senate Bill 283.” This report states that 32,800 behavioral health workers will be needed by 2028, of which 9,532 are Counselor and Therapist positions. In addition, this report found that “70% of masters of social work and clinical and counseling psychology graduates were either working in other industries outside of healthcare, employed out of state, or not working on year after degree completion.”¹

In 2022, the ASWB published its exam pass rates data from 2011-2021 (details provided in Appendix C). The data specific to Maryland highlights significant challenges individuals have had with passing the exam. During the reporting period of 2011-2021, there were 498 test-takers in the state of Maryland, with an overall first-time pass rate of 61.2%; for women overall, the pass rate is 60.9%. However, for many people of color, the first-time pass rate drops more significantly compared to their white counterparts, who passed on the first time at a rate of 77.9%, Hispanic/Latino – 67.5%, Multi-Racial – 50%, and Black – 39.7%.

In 2023, the article "*Alternative Pathways to Social Work Licensure: A Critical Review and Social Equity Policy Analysis*" was published and provided information related to alternative

¹ Hall, Andy, et al. Maryland Health Care Commission, 2024, Investing in Maryland’s Behavioral Health Talent: A Needs Assessment to Inform the Design of the Behavioral Health Workforce Investment Fund Established by the Maryland Legislature through Senate Bill 283, https://marylandmatters.org/wp-content/uploads/2024/11/Full-Report_Maryland-BH-Workforce-Assessment-_Final-Oct-2024.pdf.

methods to evaluate skills and knowledge for individuals with significant test-taking challenges. This research identifies three assessment formats (oral exams, portfolios, and performance assessments/simulations). This report also identifies that using the social equity criteria (procedural fairness, access, quality, outcomes, overall outcomes) the least biased approaches with “the next possibility of being equitable pathways to licensure” are jurisprudence exams and provisional licensure.²

In addition to the information gathered from the ASWB report, the Workgroup also wanted to assess the pass rates for individuals who are seeking licensure and deaf or hard of hearing. While the report did not provide that specific data, the data provided for Gallaudet University (a university providing education to those who are deaf or hard of hearing) indicates that only 38.7% of test takers who identified as graduating from Gallaudet University passed the ASWB exam on the first time and 50% eventually passed, compared to 74.3% and 78.9% respectively throughout the United States and Canada.³

Using the aforementioned information, along with all of the other resources, discussions, and presentations, the Workgroup recommends the following by majority vote.

The Workgroup's recommendations are based on sixteen Workgroup meetings, each subgroup met a minimum of three times, presentations from professionals from various fields (including Workgroup members), and the review of numerous reports, handouts, and articles.

Workgroup Final Report Findings and Recommendations

To the extent possible, these final report findings and recommendations reflect the Workgroup's commitment to eliminating bias and enhancing the social work licensure process in Maryland, striving to make it more equitable, inclusive, and efficient.

Per the requirements of SB871, the final report of the Workgroup shall:

- (1) examine each type of license established under Title 19 of the Health Occupations Article by:
 - (i) conducting a bias analysis of the qualifications for each type of license;
 - (ii) determining whether each type of license is necessary;
 - (iii) identifying alternatives to examination requirements that may be used to assess an applicant's qualifications for each type of license;
 - (iv) considering examination testing options, including the development of a State-based competency examination, minimum requirements for a national examination to be approved for State applicants, utilization of ranges of examination scores, and other policies to ensure a bias-free examination;

² Hirsch J, DeCarlo M, Lewis A, Walker C. Alternative Pathways to Social Work Licensure: A Critical Review and Social Equity Policy Analysis. *J Evid Based Soc Work* (2019). 2024 Mar-Apr;21(2):177-198. doi: 10.1080/26408066.2023.2284919. Epub 2023 Nov 21. PMID: 38493307.

³ Gallaudet University. (2022). *ASWB social work licensing exam report for social work schools and programs*. Association of Social Work Boards.

- (v) identifying barriers in addition to the examination that present challenges to licensure in the State; and
 - (vi) identifying the circumstances under which unlicensed individuals work in State and federal government positions as social workers; and
- on or before December 1, 2024, report to the Senate Finance Committee and the House Health and Government Operations Committee, in accordance with § 2–1257 of the State Government Article, on its:
- (i) findings under item (1) of this subsection; and
 - (ii) recommendations to eliminate bias and make the process for licensing social workers in the State more fair, diverse, and efficient.

(i) Study to examine each type of license under the Maryland Social Workers Practice Act (Title 19 of the Health Occupations Article)

Conducting a bias analysis of the qualifications for each type of license:

Finding: Once the Workgroup and CMAG completed the research to become more familiar with the components of a Bias Analysis, the specialized qualifications to conduct one, and the need for an outside contractor to conduct a full Bias Analysis, the workgroup determined that this task was beyond its capacity. The following information includes detailed research and information related to a bias analysis conducted in relation to this requirement.

Standardized testing is a common method for assessing knowledge and competency in various fields, but it often faces scrutiny for inherent biases. Bias can affect the outcomes for test-takers from different backgrounds, especially along racial, ethnic, linguistic, and age lines. In the case of the Association of Social Work Boards (ASWB) exam, recent data has sparked concern over disparities in pass rates across different demographic groups.

Bias analysis is crucial in standardized testing to ensure that assessments are fair, valid, and free from systemic inequities. Whether used for educational, professional licensure, or employment purposes, standardized exams must demonstrate that they accurately measure intended competencies without disadvantaging any particular group. This report outlines key strategies, statistical methods, and best practices for conducting bias analyses on standardized tests.

Key Components of Bias Analysis

Differential Item Functioning (DIF) Analysis

DIF measures whether individual items on an exam perform differently for subgroups of test-takers (e.g., based on race, gender, or socioeconomic status) with the same ability level. Items displaying significant bias are either modified or removed to prevent unfair advantages or disadvantages (American Educational Research Association [AERA] et al., 2014).

The Mantel-Haenszel statistic and logistic regression are commonly employed to detect DIF, as they compare the likelihood of success on specific items between different groups (Camilli & Shepard, 1994).

Differential Test Functioning (DTF) Analysis

While DIF focuses on individual items, DTF assesses bias at the entire test level. It determines whether cumulative bias from multiple items impacts overall test outcomes for certain demographic groups. DTF analysis offers a broader perspective on systemic disparities across the entire exam (Raju et al., 1995).

Demographic Performance Monitoring

Comparing pass rates across demographic groups helps identify trends that might indicate broader systemic inequities. Disparities can suggest that factors such as access to resources, preparation time, and cultural or language barriers may be influencing outcomes rather than true differences in ability (Camilli & Shepard, 1994).

Linguistic and Cultural Sensitivity

Language bias occurs when the wording of items assumes cultural or linguistic knowledge not shared by all groups. A bias analysis must evaluate readability levels and ensure that questions are accessible to all intended test-takers, reducing unfair barriers (AERA et al., 2014).

Steps to Conduct a Bias Analysis on Standardized Tests

- **Collect and Analyze Disaggregated Data:** Begin by examining pass rate data broken down by race, ethnicity, age, language, and other relevant demographics. In the ASWB report, for example, data revealed that white candidates were twice as likely to pass the exam on the first attempt as Black candidates. Collecting this data is the foundation of identifying disparities.
- **Examine Test Content for Cultural Bias:** A bias analysis should involve a review of the exam's content to see if certain questions favor a specific cultural background or education system.
- **Assess the Testing Process:** Evaluate how the exam is administered. Some groups may have less access to test preparation resources, leading to lower pass rates.
- **Incorporate Psychometric Analyses:** Psychometric techniques such as Differential Item Functioning (DIF) are used to statistically determine if test questions are harder for one group than another, controlling for overall ability. This analysis helps to pinpoint specific items that may be contributing to score gaps.
- **Consult Independent Experts:** Engage third-party researchers to validate findings. Bias detection should not rely solely on internal reviews. Allow independent experts to review test development processes and recommend modifications to reduce bias.
- **Gather Qualitative Feedback:** Collect testimonies from test-takers regarding their experiences. These narratives can provide insight into barriers that the data alone might miss.

- Analyze the Consequences of Failure: Examine how test failure impacts different groups. Bias analysis must look beyond pass/fail rates and consider the broader implications for the careers and lives of test-takers.
- Recommend Alternatives: Based on the findings, suggest alternatives. Some states, like Illinois and Minnesota, have introduced alternative pathways. These types of reforms can reduce reliance on biased tests.

Effective bias analysis for standardized tests requires both robust statistical tools like DIF and DTF and qualitative strategies to ensure cultural sensitivity. Recent advances in intersectional analysis offer more comprehensive ways to uncover subtle forms of bias that traditional methods may miss. Ensuring transparency and equitable preparation opportunities remains essential for creating fair testing environments.

The Workgroup is requesting the Maryland Department of Health's assistance in procuring the services of an outside agency with the skills and experience to conduct this type of analysis. In addition, the Workgroup is requesting funding for this procurement.

(ii) Determining whether each type of license is necessary

Recommendation: The Workgroup has determined that all levels of licensure are necessary. The LBSW, LMSW, and LCSW-C licenses will remain in place; however, the parameters for obtaining the various licenses are recommended for change.

LBSW and LMSW licensure will continue to have the same educational and experiential requirements. The recommended change is to remove the requirement to take the ASWB exam in order to obtain licensure. For the LCSW-C license, the Workgroup is recommending that an alternative pathway to licensure be provided as an option besides the ASWB exam for those seeking the LCSW-C license.

By majority vote, the Workgroup agreed to an alternative pathway for those seeking their Licensed Clinical Social Worker-Certified license. They have narrowed those choices down to the process established in Illinois (an individual is offered an alternative pathway if they are unsuccessful in taking the exam) and the process established in Minnesota (all individuals have the choice of taking the ASWB exam or using an alternative pathway). The work group agrees that they need additional time to decide which alternative pathway would be best suited for Marylanders.

(iii) Identifying alternatives to examination requirements that may be used to assess an applicant's qualifications for each type of license

Recommendation: The Workgroup recommends that an alternative pathway be established for individuals seeking LCSW-C licensure in the state of Maryland. The LBSW and LMSW do

not have an alternative pathway, as they are no longer required to take the ASWB for licensure in the state of Maryland.

After reviewing multiple alternative pathways, the Workgroup narrowed down to the two used in Illinois and Minnesota through a majority vote. In Illinois, an individual must attempt the ASWB exam once. If they are unsuccessful, they may use an alternative pathway for the LCSW license. In Minnesota, individuals can choose the alternative pathway without having to attempt the ASWB exam first.

The Workgroup obtained information about the alternative pathways other states are implementing through presentations to the Workgroup and research by workgroup members and the hired consultants. The Workgroup reviewed all the alternatives presently available, as seen in Appendix D, and a survey was conducted of all Workgroup members. Survey results revealed that the majority of Workgroup members expressed support for the alternative pathways established in Illinois and Minnesota.

The components of the alternative pathway vary widely. Illinois requires individuals to complete an additional 3,000 work hours and receive additional supervision. Texas is discussing the implementation of an individual having to complete a portfolio of 11 papers, case studies, etc. (Additional details about various alternative pathways can be found in Appendix D). The Workgroup will continue to work together to determine the specific components of the alternative pathways that best suit Marylanders.

Upon acceptance of the recommendations, the Workgroup aims to implement a plan to re-engage individuals who were previously unsuccessful in obtaining licensure (LBSW, LMSW, or LCSW-C). This plan will outline strategies and parameters to support these individuals in returning to the field of Social Work or pursuing licensure through an alternative pathway. To support the work of the Maryland Board of Social Work Examiners, the Workgroup will assess potential staffing and resource requirements to align with the recommendations and potential changes to the licensure process.

The Workgroup will need to have a further discussion related to the details and implementation of the alternative pathway.

(iv) Considering examination testing options, including the development of a State-based competency examination, minimum requirements for a national examination to be approved for State applicants, utilization of ranges of examination scores, and other policies to ensure a bias-free examination

Recommendation: To establish a bias-free examination process, the Workgroup recommends the following:

- ***Not establishing a State-based competency exam;***

- *Establishing minimum requirements for all licensure levels (LBSW, LMSW, and LCSW-C) in accordance with the Maryland Board of Social Work Examiners;*
- *Changes made to the ASWB exam to include separate modules to enhance the process for individuals choosing to retake the test rather than using an alternative pathway; and*
- *Establishing alternative pathways for LCSW-C licensure.*

The Workgroup does not recommend the development of a State-based competency exam, as seen in states such as Texas (details can be found in Appendix D). As stated previously, the Workgroup recommends removing the ASWB exam as a requirement for LBSW and LMSW licensure in the State of Maryland; however, the educational and experience minimum requirements identified by the Maryland Board of Social Work Examiners will remain the same.

Members of the Workgroup—who are also representatives of ASWB—have stated in Workgroup meetings that ASWB is currently working to make changes to the exam to establish separate modules, allowing an individual to only have to retake the sections where they were unsuccessful. They have stated that this change will be in place in 2026.

To address policies to ensure a bias-free examination process, the workgroup has recommended establishing an alternative pathway for individuals seeking their LCSW-C license. In addition, the Workgroup also recommends various policy changes and recommendations detailed in section vii below.

In addition, similar to other states considering various options, the Workgroup will be assessing whether incorporating a jurisprudence exam would be beneficial. The jurisprudence exam would test individuals on their knowledge of ethics and Maryland laws and regulations related to social work practice.

(v) Identifying barriers in addition to the examination that present challenges to licensure in the State

Findings: In addition to the barriers identified related to the passing of the ASWB exam, the Workgroup has also identified the following additional barriers:

- a. Financial barriers when having to retake the exam.
- b. Financial barriers related to paying for clinical supervision. The Workgroup identified that there are individuals who must pay for clinical supervision for various reasons.
- c. Barriers specific to the deaf and hard-of-hearing community.
- d. The time frame to retake the test is currently 90 days (three months).
- e. Changing the exam to a module format allows individuals only to have to re-take sections where they were unsuccessful.
- f. Lack of clarity in the accommodations process and available exam preparation resources.

(vi) Identifying the circumstances under which unlicensed individuals work in state and federal government positions as Social Workers

Findings: The Workgroup has not determined any circumstances under which unlicensed individuals can work as social workers in state or federal government positions.

The Workgroup has not identified any circumstances under which unlicensed individuals are authorized to work in state or federal government positions, specifically as "Social Workers." It is important to note that Maryland has title protection laws, which restrict the term "Social Worker" to those duly licensed. While unlicensed individuals may perform certain non-social work functions, they are not permitted to officially hold or use the title "Social Worker" without proper licensure.⁴

(vii) Recommendations to eliminate bias and make the process for licensing social workers in the State more fair, diverse, and efficient

Findings: The information in this section addresses the identified barriers in Section v.

- a. Members of the Workgroup discussed and suggested waiving the fees (\$230.00) for individuals having to retake the test.
- b. The Workgroup is exploring other recommendations such as offering Category II CEUs for supervision to decrease the financial burden. In addition, the Workgroup has discussed other behavioral health professionals, such as licensed clinical professional counselors (LCPC) or Doctor of Psychology (PsyD), to provide clinical supervision.
- c. The Workgroup is recommending that the timeline to retake the exam is decreased from 90 days.
- d. The Workgroup has determined that removing the ASWB exam for the LBSW and LMSW levels of licensure and establishing the alternative pathway for the LCSW-C level of licensure will address the barriers identified for deaf and hard-of-hearing individuals seeking social work licensure.
- e. The Workgroup is also considering that individuals would only be required to retake the portions of the exam they did not pass, similar to the approach used in other standardized tests, such as the Certified Public Accountant (CPA) exam. (Representatives on the Workgroup who represent the ASWB have stated that this change to their test-taking process is currently in development and scheduled for release in 2026)
- f. Workgroup members representing various organizations involved in the licensure process have stated that individuals seeking licensure often contact the wrong organization when seeking assistance, accommodations, resources, etc. To address this, the Workgroup recommends developing a comprehensive resource guide for individuals upon completing their education. This guide would serve as a clear and accessible roadmap for navigating the test-taking and licensure processes and would include the following:

⁴ Title 10 MARYLAND DEPARTMENT OF HEALTH Subtitle 42 BOARD OF SOCIAL WORK EXAMINERS Chapter 01 Regulations Governing Licensure Authority: Health Occupations Article, §§19-101—19-502, Annotated Code of Maryland

- a. Detailed information about the various organizations, including their contact information, the resources they offer, and their specific roles in the education and licensure processes (CSWE, ASWB, NASW, NASW-Maryland, and the Board of Social Work Examiners).
- b. Information on available resources for licensure candidates, such as free test preparation courses, instructions on how to request accommodations, and details on the types of accommodations that can be provided.

Interim Report Recommendation Updates

Note: Interim Report Recommendations that have been updated are clearly notated below in italics.

(i) Whether to continue to use examinations developed by the Association of Social Work Boards (ASWB) as a requirement for a Bachelor Social Worker license or a Master Social Worker license. This recommendation was based on the majority vote of the Workgroup.

Recommendation 1: The ASWB exam will not be required for a Bachelor Social Worker license (LBSW) or a Master Social Worker license (LMSW). Consider an alternative pathway to licensure for a Licensed Clinical Social Worker-Certified (LCSW-C) involving several reliable components. The recommended requirements for each level of licensure are as follows:

Bachelor Social Worker license

- Obtained a degree from a CSWE accredited undergraduate program of Social Work
- Satisfy the background check.

Master Social Worker license

- Obtained a degree from a CSWE accredited graduate program of Social Work
- Satisfy the background check.
- Current regulations on supervision would still apply

Licensed Clinical Social Worker-Certified (LCSW-C)

- Be a licensed MSW professional.
- Complete 2 years as a licensee with supervised experience of at least 3,000 hours with a minimum of 100 hours of periodic face-to-face supervision in the practice of social work to obtain a Licensed Clinical Social Worker-Certified license.
- *The majority of the Workgroup members agreed to provide an alternative pathway to licensure for those seeking an LCSW-C. The Workgroup has narrowed down the alternative pathway to two choices based on the current work of the states of Illinois and Minnesota. Details of these and other states' alternative pathways can be found in Appendix C.*

(ii) Whether to establish a temporary license for applicants for a Bachelor Social Worker license or a Master Social Worker license who, except for passing an examination required under Title 19, Subtitle 3 of the Health Occupations Article, meet the education and experience requirements for a license to practice Bachelor Social Work or Master Social Work under Title 19 of the Health Occupations Article.

Recommendation 1: *The majority of the Workgroup voted that individuals seeking their LBSW or LMSW will be licensed in the state of Maryland once they meet the education and experience requirements, for a license to practice as a Bachelor Social Worker or a Master Social Worker under Title 19 of the Health Occupations Article.*

(iii) How supervision may be provided to Bachelor Social Worker licensees and Master Social Worker licensees at no cost to the licensees.

Recommendation 1: Allow board-approved licensed clinical supervisors to receive Category II CEU credit in exchange for providing supervision to LBSWs/LMSWs at a reduced cost. This recommendation would mitigate the mutual financial burden for the supervisor and supervisee.

- The amount of CEUs granted could be considered upon approval of the recommendation

Recommendation 2: *Cover the cost of Category I and Category II training provided by approved social work CEU providers.*

Recommendation 3: Consider an incentive (e.g., tax credit), that could be provided to employers to offer access to board-approved supervisors which would eliminate the additional out-of-cost expense for LBSWs and LMSWs.

- Should consider employer/agency paying for supervision

Recommendation 4: Allow for supervision to be completed virtually to ensure access to supervisors that may not be easily accessible locally.

(iv) If the Workgroup determines under item (i) that the examinations developed by the Association of Social Work Boards should not be used or under item (ii) of this item that temporary licenses should be established, whether additional experience or education requirements are necessary.

Item i:

Bachelor Social Worker license

- Obtained a degree from a CSWE-accredited undergraduate program of Social Work
- Satisfy the background check.

Master Social Worker license

- Obtained a degree from a CSWE-accredited graduate program of Social Work

- Satisfy the background check.
- Complete 2 years as a licensee with supervised experience of at least 3,000 hours with a minimum of 100 hours of periodic face-to-face supervision in the practice of social work to obtain a certified social worker license.

Item ii: Temporary [Provisional] License

The majority of the Workgroup voted to grant LBSW and LMSW licensure to all individuals who met the education and experience requirements as stated above, eliminating the need for temporary licensure. All information provided below is from the interim report; however, this information listed will grant a person licensure NOT Provisional Licensure.

Bachelor Social Worker *Provisional* License

- Obtained a degree from a CSWE accredited undergraduate program of Social Work.
- Satisfy the background check.
- Must obtain four hours per month of supervision.

Master Social Worker *Provisional* License

- Obtain a degree from a CSWE accredited graduate program of Social Work.
- Satisfy the background check.
- Current regulations on supervision would still apply

Advanced Clinical Master Social Worker License (LCSW-C_

- Be a licensed MSW professional.
- Complete 2 years as a licensee with supervised experience of at least 3,000 hours with a minimum of 100 hours of periodic face-to-face supervision in the practice of social work to obtain an advanced clinical social worker license.

(v) A timeline for phasing in any determinations made under item (i), (ii), (iii), or (iv) of this item;

- item (i): Jan 1, 2025
- item (ii): Jan 1, 2026
- item (iii): June 30, 2025
- item (iv): Jan 1, 2025, and Jan 1, 2026

Workgroup Members

Workgroup appointment outreach began soon after the enactment of SB 871 (Chapter 228) (2023) and was finalized in October 2023. The Workgroup consists of the following appointed members as of November 30, 2024. Some members presented in the interim report have changed:

Table 1. Workgroup Members

Seat	Name
Chair of the Workgroup as designated by the Governor	Karla Abney, MSW, MSN, LMSW
One member of the Senate of Maryland, who is a member of the Legislative Black Caucus, appointed by the President of the Senate	Senator Mary Washington
One member of the Senate of Maryland, who is a member of the Legislative Black Caucus, appointed by the Speaker of the House	Delegate Robbyn T. Lewis
Secretary of Health, or designee	Laura Torres, LCSW-C
Secretary of Human Services, or designee	Robin L. Harvey, LCSW
Chair of State Board of Social Work Examiners, or designee	Adrienne Ekas, PhD, LCSW-C
Chair of the Maryland Commission on Health Equity, or designee	Erin S. Penniston, LMSW, Designee
Executive Director of the State Board of Social Work Examiners, or designee	Karen Richards, LSCW-C
Director of the Governor’s Office of the Deaf and Hard of Hearing, or designee	Diamon Halliburton
Social Worker who is deaf or hard of hearing and is familiar with the licensing process for deaf and hard of hearing Social Workers, designated by the Maryland Association of the Deaf	Judith L. Mounty, EdD, LCSW-C, LICSW, LSW
Representative of the NAACP Maryland State Conference, designated by the President of the NAACP Maryland State Conference	Philicia Ross, LCSW-C
Representative of the Baltimore Legacy Chapter of the Association of Black Social Workers, designated by the Baltimore Legacy Chapter of the Association of Black Social Workers	Christa Gilliam, MSW, PhD
Representative of the Maryland Chapter of the National Association of Social Workers, designated by the Executive Director of the Maryland Chapter of the National Association of Social Workers	Karessa Proctor, BSW, MSW, Executive Director, NASW Maryland
Member from the Greater Washington Society for Clinical Social Work, designated by the President of the Greater Washington Society for Clinical Social Work	Karla J. Abney, MSW, MSN, LMSW
Two representatives of the Association of Social Work Boards, designated by the President of the Association of Social Work Boards	Dale Atkinson, Esq. Cara E. C. Sanner
Three Deans of Social Work from accredited social work master’s programs serving the State, one of which shall be from a Historically Black College or University, appointed by the Governor	Anna McPhatter, PhDLSW, Dean , School of Social Work, Morgan State University

	Judy Postmus, PhD, ACSW, Dean, the University of Maryland Baltimore Linda Houser, MSW, PhD, Director of School of Social Work, Salisbury University
Three representatives from nongovernmental social service organizations that primarily work to support Western Maryland, Central Maryland, and the Eastern Shore, appointed by the Governor	Temeka Bailey, LCSW-C, LICSW (Central Maryland) Kristine Garlitz, LCSW-C (Eastern Shore) June Cleary (Western Maryland)
Two individuals who received a master’s degree in social work within the immediately preceding 10 years and who may have been negatively impacted by the examination requirement for licensure under Title 19 of the Health Occupations Article, appointed by the Governor	Simone Bramble, LCSW-C Emanuel Wilkerson, LMSW

Former Workgroup Members: Katherine Breen and Stephanie Slowly

Workgroup Staff:

Ana Lazarides, Prescription Drug Monitoring Program Director
Cynthia Whitehead, Administrative Specialist, Office of Controlled Substances Administration
Samuel Paul, J.D., Senior Health Policy Analyst, Office of Governmental Affairs, MDH

Former Workgroup Staff: Michelle Darling and Kathy Guggino

Maryland Department of Health participants:

Marie Grant, JD, Former Assistant Secretary for Health Policy MDH
Megan Peters, MPH, Former Acting Director, Office of Governmental Affairs, MDH
Serena Milawsky, Intern, Office of Governmental Affairs, MDH

Subgroups

The Workgroup agreed that the most efficient way to formulate findings and recommendations mandated by SB 871 was to form four subgroups, listed below.

The Workgroup has established four subgroups to work in close partnership with community stakeholders to evaluate and assess the Social Worker Requirements for Licensure and to help inform thoughtful, impactful findings and recommendations. Workgroup members were able to self-select their Subgroup of choice, except the Universities/Programs of Social Work Subgroup whose members are Deans, Directors, and Educators in Maryland Schools of Social Work,

possessing in-depth knowledge of social work education, and CSWE policies regulating social work education. Please see Appendix B for the list of Subgroups, the Subgroup Chairs, and the Subgroup members.

Subgroups Roles and Responsibilities-Chair Responsibilities

- Schedule Subgroup Meetings: Subgroups are required to meet at least once (monthly) before the monthly full Workgroup meeting, but if subgroup members wish to meet more often, they are welcome to schedule the meetings.
- Subgroup Meeting Summaries: Before the monthly full Workgroup meeting, the subgroups are expected to provide a summary of their meetings to MDH Staff a week before the Tuesday Workgroup meeting to allow time to compile the summaries or notes into the meeting materials packet and send them to the Workgroup.
- Interpreters: Inform MDH staff at least a week before each Subgroup meeting to allow time to schedule interpreters if needed.
- Contribute to required reports, including recommendations from subgroups.

The Subgroup focus areas are included below. These focus areas are not exclusive.

1. **Policy** - Board of Social Work, Disability and Accommodations Certification and Requirements
2. **Universities/Schools/Programs of Social Work** - Curriculum, CSWE Requirements
3. **Testing Barriers** - Cost of Preparation, Exam Fees, Testing Locations, Disability and Accommodations. Concerns about testing barriers include the accommodations requesting process overall and identified concerns about how candidates are treated and the triggers for members of certain identity groups.
4. **Recommendations on Testing** - The mandate for this group is twofold:
 - a. First: Recommendations on whether to continue the use of the ASWB exam for the LBSW and LMSW, and whether to establish a temporary license for those who meet the LBSW. LMSW requirements but have not passed the ASWB exam, how supervision could be provided to LBSWs/LMSWs at no cost to the licensees.
 - b. Second: Complete Licensure Examinations as stipulated by SB 871 Section 2, Subsection h (found on page 8 of Senate Bill 871 (SB 871)).

See Appendix A for Subgroups Background Information and Meeting Information

Workgroup Meetings Summaries

October 24, 2023: The first meeting of the Workgroup, SB871 focused on a discussion regarding what the Workgroup would like to accomplish. A schedule was created for future meetings, as well as points of discussion for the next meeting.

November 14, 2023: The meeting focused on the Association of Social Work Boards (ASWB) examination pass rates (see Appendix B), comparing the state of Maryland to nearby jurisdictions and nationally. There was also discussion on the National Association of Deans and Directors of Schools of Social Work (NADD) plans and position on the exam requirement. The

meeting focus transitioned to comparing Social Work requirements in the other states included in HHS Region Three. The discussion then moved to states that have removed the exam requirements. The meeting finished with discussions on temporary and provisional licensure requirements.

December 5, 2023: The Workgroup meeting focused on the grandfathering licensure process and transitions to alternative licensure pathways, the Social Work application and licensure processes in the state of Maryland and surrounding jurisdictions, continuing education requirements, and the revised licensure requirements for the Licensed Independent Social Work (LISW).

December 19, 2023: The Workgroup meeting discussion focused on the fee structure for Social Work licenses, including initial fees for first-time licensees which includes BSWE fees and ASWB exam and prep test fees, as well as license renewal fees, to include CEUs, comparable professions (e.g., Counselors, Nurses, and Psychologist). The discussion also focused on the cost of supervision for graduate Social Workers.

January 9, 2024: The meeting focused on Testing Barriers for the Deaf and Hard of Hearing and the Workgroup Subgroups Roles and Responsibilities. The presenter for this Workgroup was Dr. Judith L. Mouny, Ed.D. MSW, LCSW-C, LICSW, LCSW. Dr. Mouny presented on Testing Barriers for the Deaf and Hard of Hearing. The meeting focus shifted to the formation of Subgroups. Subgroups were agreed upon, including the assignment members of each subgroup. The expectations of the Subgroups are to meet monthly at least once before the Workgroup meeting occurs the last Tuesday of the month and to provide summaries of their work to the Workgroup Staff prior to the convening of the full monthly Workgroup.

January 30, 2024: The meeting focused on the ASWB exam and the NCLEX exam. The presenters for this meeting included Dr. Stacey Hardy-Chandler, CEO of the Association of Social Work Boards (ASWB) who presented on the ASWB exam, and Jason A. Schwartz, MS, 14 Director of Outreach, NCSBN who presented on The National Council Licensing Examination (NCLEX) exam.

February 27, 2024: The meeting focused on the Subgroups' meeting summaries and the Draft Interim Report. The Subgroup Chairs presented the Subgroup Summary Reports. The Workgroup reviewed the Draft Interim Report as required by SB 871 but was unable to finalize the report. Therefore, the Workgroup decided to take a Straw Poll Vote regarding the Interim Report Question: (i) Whether to continue to use examinations developed by the Association of Social Work Boards as a requirement for a Bachelor Social Worker (BSW) license or a Master Social Worker (MSW) license. The majority vote was in favor of the elimination of the ASWB exam as a requirement for licensure at the BSW and MSW levels, however, some Workgroup members were not in attendance.

March 5, 2024 (Subgroup Chairs Meeting): Chair Abney met with the Subgroup Chairs to discuss the work of the Subgroups to date, and next steps. Those next steps included identifying

potentialities with the elimination of the ASWB exam as a requirement for licensure, and implementation of new processes, including increasing staffing to handle an increase in applicants, concerns with the grandfathering process, and enacting new regulations related to licensure. There was agreement that the implementation research and analysis will remain ongoing beyond the Interim report submission.

March 26, 2024: As a follow-up to the February 24, 2024 Workgroup meeting, the Workgroup meeting focused on a final binding vote on Interim Report Question: (i) Whether to continue to use examinations developed by the Association of Social Work Boards as a requirement for a Bachelor Social Worker license or a Master Social Worker license. The majority vote was in favor of the elimination of the ASWB exam as a requirement for licensure at the BSW and MSW levels, including Workgroup members who were not in attendance and sent in their vote via a Google Forms poll. The Workgroup also received a presentation from Laura W. Groshong, LICSW, Director, Policy, and Practice, Clinical Social Work Association (CSWA) on the Social Work Licensure Compact.

April 30, 2024: The Workgroup focused on other states with alternate pathways to licensure for Social Workers and the finalization of the Interim Report. The Workgroup received a presentation from Joel L. Rubin, MSW, LSW, ACSW, CAE, Executive Director of the Illinois Chapter of the National Association of Social Workers (NASW) on “Breaking Down Barriers to Social Work Licensure in Illinois.” The presentation included best practices and lessons learned from the implementation of licensing without the ASWB exam and alternate pathways to licensing. The Workgroup reviewed the revised Interim Report Draft via Google Docs after the Workgroup meeting to make any final comments and suggested revisions.

June 25, 2024: The meeting covered several key updates and discussions regarding licensure processes for social workers in Maryland. The Work Group highlighted upcoming meetings with key stakeholders, including Delegate Cullison and Senator Washington on May 24, Delegate Peña-Melnyk on June 18, and a meeting scheduled with Senators Klausmeier and Beidle on July 23. These meetings are part of ongoing efforts related to SB 871 (2023), which outlines the requirements for the final report, including the request for clarification regarding the bias analysis in the interim report.

Presentations included contributions from experts in the field. Dr. Concetta Pucci, PhD, LICSW, from Gallaudet University, discussed testing barriers in social work licensure, emphasizing the challenges that candidates face in the licensure process. Karessa Proctor, BSW, MSW, Executive Director of the Maryland Chapter of the National Association of Social Workers (NASW), provided updates on national trends and the NASW’s role in supporting licensure reform. Additionally, Karen Richards, LCSW-C, Executive Director of the Maryland Board of Social Work Examiners, presented data on licensure requirements and processes, including a review of current trends and challenges in the licensure system for social workers in Maryland. The group also discussed plans for moving forward with a focus on the completion of the bias analysis and further deliberation on licensure reform.

September 24, 2024: The meeting addressed several key updates and discussions regarding licensure processes. Membership changes included Stephanie Slowly's departure from the Maryland Department of Health and the appointment of Diamon Halliburton to represent the Governor's Office of the Deaf and Hard of Hearing. The group discussed the bias analysis and determined that it does not need to be completed before finalizing the recommendation to remove the ASWB exam requirement. They also discussed temporary licensure, "grandfathering" individuals who have previously failed the ASWB exam, and the high costs associated with supervision hours required for licensure. The group expressed the need for further exploration of alternative pathways to the LCSW-C license and considered how to support the Board in implementing changes, including addressing staffing and funding needs, managing a potential increase in applications, and handling grandfathering provisions. The final report is expected to be completed after bringing the contractor on board by October 1, 2024.

October 30, 2024: Karen Richards, Executive Director of the Maryland Board of Social Work, provided an overview of the Board's mission, history, structure, and its relationship with the ASWB. She emphasized the Board's role in protecting the public through licensure, education, and enforcement, noting the significant increase in licensed social workers from 4,192 in 1979 to 19,811 in 2024. Common complaints involve unprofessional behavior and supervision violations. The Board is also committed to reducing barriers to licensure, including exploring options for retake timing, fee waivers, and allowing candidates to retake only failed sections of the ASWB exam. Dr. Angel Gustus from CMAG Associates followed with a discussion of alternative licensure pathways used in other states, such as Illinois, Minnesota, Texas, Oregon, and Michigan. These pathways include additional clinical work hours, professional portfolios, and replacing the ASWB exam with a Jurisprudence Exam. The group planned to vote on the preferred alternative pathway at the next meeting. Additionally, a clarification was made regarding the Open Meetings Act, ensuring all discussions must occur during workgroup meetings.

November 13, 2024: Dr. Angela Gustus, representing CMAG Associates, presented survey results on alternative licensure pathways, with 90% of participants supporting shorter retake times, fee waivers, and the option to retake specific exam sections. Additionally, 85% favored the Illinois or Minnesota pathway models, and 80% supported offering two or more alternative options. Survey feedback included suggestions for incentives for clinical supervisors and concerns about the capacity of the Board of Social Work Examiners to manage new processes. The discussion also highlighted the complexity of conducting a bias analysis, with a recommendation to hire an external expert and extend the Work Group's timeline to address these concerns. The group considered alternative pathways used in other states and debated replacing the current exam with a jurisprudence exam. Emphasis was placed on balancing innovation in licensing with maintaining public safety, while recognizing the importance of strengthening the social work workforce to meet Maryland's mental health needs.

November 20, 2024: Dr. Angela Gustus of CMAG Associates presented survey results highlighting strong support (90%) for alternative licensure pathways, with the Illinois and

Minnesota models favored by the Work Group. Key recommendations included reducing the wait time for retaking exams, waiving re-testing fees, and allowing candidates to retake only the sections they failed. Discussions around the Illinois model raised concerns about the additional 3,000 hours required for those who fail the exam, while the Minnesota model was noted for offering a choice between exams and alternative pathways. There was also recognition of the potential harm caused by current exam requirements, particularly for marginalized communities. The Work Group agreed to recommend both models in the final report and discussed exploring alternative assessment methods and adjusting supervision requirements. Public comments were solicited, with a question about the timeline of the group's activities.

Conclusions

SB 871 (2023) demonstrates the General Assembly's commitment to supporting Maryland's Social Worker workforce and achieving optimal mental and behavioral healthcare access across Maryland. The Workgroup's findings and recommendations address barriers to achieving Maryland's fair, equitable, and effective social work licensure process. This final report underscores the importance of a bias analysis, establishing alternative licensure pathways, and removing financial and systemic obstacles. By recommending the elimination of the ASWB exam requirement for LBSW and LMSW licensure and proposing alternative pathways for LCSW-C licensure, the Workgroup aims to create a more inclusive and diverse social workforce. These reforms, coupled with continued dialogue and collaboration among stakeholders, represent a significant step forward in fostering an equitable licensure system that is aligned with the needs of Maryland's diverse population.

Appendices

Item	Title
A	Subgroup Membership Information
B	Subgroup Meeting Discussion Topics
C	2022 ASWB Exam Pass Rate Analysis
D	CMAG & Associates LLC Alternative Pathways Report
E	CMAG & Associates LLC Workgroup Survey Report
F	Recommendations from Subgroups
G	Interim Report
H	Correspondence from ASWB

Appendix A: Subgroup Membership Information

Subgroup Name: Policy	
Subgroup Member	Workgroup Seat
Chair: Vacant	
Erin S. Penniston, LMSW, Designee	Chair of the Maryland Commission on Health Equity, or designee
Philicia Ross, LCSW-C	Representative of the NAACP Maryland State Conference, designated by the President of the NAACP Maryland State Conference
Karen Richards, LSCW-C	Executive Director of the State Board of Social Work Examiners or designee
Karessa Proctor, BSW, MSW, Executive Director, NASW Maryland	Representative of the Maryland Chapter of the National Association of Social Workers, designated by the Executive Director of the Maryland Chapter of the National Association of Social Workers
Laura Torres, LCSW-C	Director of Primary Behavioral Health and Early Intervention Services, Maryland Department of Health, Behavioral Health Administration.

Subgroup Name: Recommendations on Testing	
Subgroup Member	Workgroup Seat
Chair: Christa Gilliam MSW, PhD	Representative of the Baltimore Legacy Chapter of the Association of Black Social Workers, designated by the Baltimore Legacy Chapter of the Association of Black Social Workers
Robin L. Harvey, LCSW	Secretary of Human Services, or designee
Simone Bramble, LCSW-C	Individual who received a master's degree in social work within the immediately preceding 10 years and who may have been negatively impacted by the examination requirement for licensure under Title 19 of the Health Occupations Article, appointed by the Governor
Dale Atkinson, Esq.	Representative of the Association of Social Work Boards, designated by the President of the Association of Social Work Boards
Temeka Bailey, LCSW-C, LICSW	Representative from nongovernmental social service organizations that primarily work to support Central Maryland
Kristine Garlitz, LCSW-C	Representative from nongovernmental social service organizations that primarily work to support Eastern Shore

Subgroup Name: Testing Barriers	
Subgroup Member	Workgroup Seat
Chair: Judith L. MOUNTY, EdD, LCSW-C, LICSW, LSW	Social Worker who is deaf or hard of hearing and is familiar with the licensing process for deaf and hard of

	hearing Social Workers, designated by the Maryland Association of the Deaf
Cara E. C. Sanner	Representative of the Association of Social Work Boards, designated by the President of the Association of Social Work Boards
Adrienne Ekas, PhD, LCSW-C	Chair of State Board of Social Work Examiners, or designee
Emanuel Wilkerson, LMSW	Individual who received a master's degree in social work within the immediately preceding 10 years and who may have been negatively impacted by the examination requirement for licensure under Title 19 of the Health Occupations Article, appointed by the Governor

Subgroup Name: Universities/Schools/Programs of Social Work Curriculum, CSWE Requirements etc.	
Subgroup Member	Workgroup Seat
Chair: Judy Postmus, PhD., ACSW, Dean, the University of Maryland Baltimore	Dean of Social Work from accredited social work master's programs serving the State, one of which shall be from a Historically Black College or University, appointed by the Governor
Anna McPhatter, PhD, LSW, Deam, School of Social Work, Morgan State University	Dean of Social Work from accredited social work master's programs serving the State, one of which shall be from a Historically Black College or University, appointed by the Governor
Linda Houser, MSW, PhD, Director of School of Social Work, Salisbury University	Dean of Social Work from accredited social work master's programs serving the State, one of which shall be from a Historically Black College or University, appointed by the Governor

Appendix B: Subgroup Meeting Discussion and Topics

Subgroup Meeting Dates and Topics Discussed		
Subgroup Name	Meeting Dates	Topics Discussed
Policy	February 2, 2024, February 16, 2024 November 14, 2024	<ol style="list-style-type: none"> 1) Subcommittee Requirements 2) Equitable access for licensure 3) Testing requirements 4) Testing accessibility and accommodations 5) State regulatory policies, legislation, and regulations regarding licensure and exam requirements and waivers 6) Interim Draft Report Recommendations 7) Alternative pathways
Recommendations on Testing	February 13, 2024, February 20, 2024, March 5, 2024 April 16, 2024	<ol style="list-style-type: none"> 1) Reviewed subcommittee mandate 2) Invited community stakeholders to provide input in writing. 3) Welcomed brief presentation from community stakeholders, Social Workers for Equity and Anti-Racism (SWEAR) 4) Subcommittee members brainstormed and discussed Interim Draft Report Recommendations to include in the interim report for further consideration and the Next Steps for the Subgroup 5) Further review of Interim Draft Report Recommendations
Testing Barriers	January 26, 2024, February 6, 2024, February 20, 2024 October 22, 2024	<ol style="list-style-type: none"> 1) Subgroup Mandate and Goals 2) Cost of exam preparation, other fees, and financial concerns 3) Testing as a barrier to licensure: Testing Process, Locations and Environmental Barriers 4) Disability and other Accommodations 5) Concerns about the impact of institutional racism and other systemic inequities in the pipeline leading to testing. 6) Test structure and format 7) Interim Draft Report Recommendations

		8) Bias analysis 9) Temporary licensure 10) Provisions for reengagement 11) Alternative pathways to licensure
Universities	January 30, 2024 February 18, 2024 April 30, 2024 October 4, 2024	1) Reviewed subcommittee mandate 2) Efficacy and fairness of the ASWB exams 3) Testing Accommodations 4) Interim Draft Report Recommendations 5) Supervision and mentoring needs, and the fees associated with such 6) Improved training of clinical supervisors 7) Advanced licensure exam process 8) Alternative pathways to licensure 9) Implications of eliminating the ASWB exam

Appendix C: 2022 ASWB Exam Pass Rate Analysis

Social Work Exam Passage Rates Maryland Specific Data, 2011-2021 Maryland Bachelor's Exam Passage Rates, 2011-2021

Number of test-takers and **first-time** pass rates by demographic group 2011 – 2021

State/Province	# test-takers (overall)	Pass rate (overall)
MD	498	61.2%

Demographic	Group	# test-takers	Pass rate
Race/Ethnicity	Asian	7	
	Black	189	39.7%
	Hispanic/Latino	40	67.5%
	Multiracial	12	50.0%
	Native American/Indigenous peoples	0	
	White	235	77.9%
Gender	Men	61	63.9%
	Women	437	60.9%
Age	18 - 29	294	65.3%
	30 - 39	106	54.7%
	40 - 49	59	54.2%
	50 and older	39	59.0%
Language	English	464	62.5%
	Non-English	34	44.1%

<https://www.aswb.org/exam/contributing-to-the-conversation/aswb-exam-pass-rates-by-state-province/>

Maryland Exam Passage Rates, 2011-2021

Number of test-takers and **first-time** pass rates by demographic group 2011 – 2021

State/Province	# test-takers (overall)	Pass rate (overall)
MD	8,003	78.5%

Demographic	Group	# test-takers	Pass rate
Race/Ethnicity	Asian	218	82.1%
	Black	2,708	55.5%
	Hispanic/Latino	458	79.3%
	Multiracial	207	85.0%
	Native American/Indigenous peoples	14	78.6%
	White	4,198	92.8%
Gender	Men	907	74.8%
	Women	7,092	79.0%
Age	18 - 29	4,495	83.0%
	30 - 39	2,094	75.8%
	40 - 49	919	69.0%
	50 and older	495	66.1%
Language	English	7,564	79.4%
	Non-English	439	62.4%

Maryland - Clinical Exam Passage Rates, 2011-2021

Number of test-takers and first-time pass rates by demographic group 2011 – 2021			
State/Province	# test-takers (overall)	Pass rate (overall)	
MD	4,540	78.7%	
Demographic	Group	# test-takers	Pass rate
Race/Ethnicity	Asian	104	84.6%
	Black	1,129	54.1%
	Hispanic/Latino	195	65.6%
	Multiracial	99	87.9%
	Native American/Indigenous peoples	7	
	White	2,905	88.6%
Gender	Men	503	75.5%
	Women	4,035	79.1%
Age	18 - 29	1,405	86.8%
	30 - 39	1,982	79.8%
	40 - 49	687	67.7%
	50 and older	466	65.9%
Language	English	4,347	79.4%
	Non-English	193	62.2%

Social Work Exam Passage Rates, 2018-2021, Maryland & National Data by Race & Ethnicity Maryland - Exam - Race/Ethnicity, 2018-2021

Number of test-takers and first-time pass rates by demographic group 2018 – 2021			
State/Province	# test-takers (overall)	Pass rate (overall)	
MD	199	54.3%	
Demographic	Group	# test-takers	Pass rate
Race/Ethnicity	Asian	3	
	Black	69	29.0%
	Hispanic/Latino	28	60.7%
	Multiracial	5	
	Native American/Indigenous peoples	0	
	White	88	70.5%

National - Exam - Race/Ethnicity, 2018-2021

Race/Ethnicity	2018		2019		2020		2021	
	n	Pass rate	n	Pass rate	n	Pass rate	n	Pass rate
Asian	73	60.3%	85	48.2%	85	57.6%	97	71.1%
Black	515	37.5%	475	34.9%	319	33.2%	446	31.6%
Hispanic/Latino	254	52.8%	274	49.6%	175	54.9%	293	54.6%
Multiracial	77	77.9%	69	73.9%	54	77.8%	100	71.0%
Native American/ Indigenous peoples	38	71.1%	34	55.9%	33	57.6%	40	75.0%
White	2,659	76.7%	2,573	75.7%	1,944	75.8%	2,406	77.0%

<https://www.aswb.org/wp-content/uploads/2022/07/2022-ASWB-Exam-Pass-Rate-Analysis.pdf> pages 76-84

The following data compares national passage rates by ethnicity and race from 2018-2021. The national data is limited to 2018-2021 due to the implementation of a new exam concept in 2018.

Maryland - Exam - Race/Ethnicity, 2018-2021

Number of test-takers and first-time pass rates by demographic group 2018 – 2021			
State/Province	# test-takers (overall)	Pass rate (overall)	
MD	3,408	74.6%	
Demographic	Group	# test-takers	Pass rate
Race/Ethnicity	Asian	89	85.4%
	Black	1,213	51.4%
	Hispanic/Latino	232	75.0%
	Multiracial	95	83.2%
	Native American/Indigenous peoples	4	
	White	1,676	90.0%

National - Exam - Race/Ethnicity, 2018-2021

Race/Ethnicity	2018		2019		2020		2021	
	n	Pass rate	n	Pass rate	n	Pass rate	n	Pass rate
Asian	558	68.8%	575	69.6%	535	72.3%	754	71.2%
Black	3,010	45.0%	3,355	44.5%	3,254	45.2%	4,225	43.9%
Hispanic/Latino	1,755	66.4%	2,031	62.1%	1,878	65.3%	2,752	62.0%
Multiracial	400	82.3%	427	79.2%	430	83.7%	585	77.9%
Native American/ Indigenous peoples	96	66.7%	107	59.8%	114	67.5%	136	65.4%
White	10,474	86.2%	11,160	85.1%	9,984	87.1%	12,423	85.3%

Maryland - Clinical Exam - Race/Ethnicity, 2018-2021

Number of test-takers and **first-time** pass rates by demographic group 2018 – 2021

State/Province	# test-takers (overall)	Pass rate (overall)
MD	1,891	77.3%

Demographic	Group	# test-takers	Pass rate
Race/Ethnicity	Asian	37	81.1%
	Black	513	53.4%
	Hispanic/Latino	91	65.9%
	Multiracial	52	86.5%
	Native American/Indigenous peoples	2	
	White	1,162	88.4%

National - Clinical Exam - Race/Ethnicity, 2018-2021

Race/Ethnicity	2018		2019		2020		2021	
	n	Pass rate	n	Pass rate	n	Pass rate	n	Pass rate
Asian	574	67.2%	561	68.1%	567	72.1%	768	74.9%
Black	2,187	39.2%	2,293	44.0%	2,634	44.6%	2,932	46.2%
Hispanic/Latino	1,838	62.0%	2,071	62.5%	1,873	67.0%	2,726	65.8%
Multiracial	409	77.8%	436	78.4%	430	80.2%	576	80.7%
Native American/ Indigenous peoples	89	65.2%	98	66.3%	97	63.9%	115	59.1%
White	10,437	82.7%	11,205	82.8%	10,684	83.7%	12,977	85.0%

Appendix D: CMAG & Associates LLC Alternative Pathway Report



This report, prepared by the CMAG & Associates LLC consultant team, comprehensively analyzes alternative pathways for clinical social workers' licensure. Contracted by the Maryland Department of Health for the Maryland State Workgroup on Social Work Licensure Regulations, the research aims to explore flexible and equitable licensure models that address workforce challenges while maintaining high professional competency standards. This work directly responds to findings from the ASWB report on exam pass rates, highlighting disparities in licensure outcomes and underscoring the need for alternative pathways. Through a review of best practices, stakeholder input, and national trends, this report offers recommendations designed to improve access to licensure, support workforce diversity, and enhance service delivery in Maryland's behavioral health system.

This report will examine the alternative licensure pathways established by Illinois and Minnesota, which have implemented models to address barriers to licensure and promote workforce inclusivity. In addition to these case studies, the report will summarize the current licensure pathways utilized across the United States, highlighting emerging trends and policy shifts. The primary objective is to identify viable options tailored to meet Maryland's specific needs while ensuring the integrity of clinical social work practice. By evaluating these pathways, the report aims to equip the Maryland State Workgroup with actionable insights to inform the development of more accessible, equitable licensure regulations.

Overview of Alternative Pathways Used By Other States

The table below provides a general overview of the licensure requirements throughout the United States.

Overview of Licensure Requirements			
Bachelor Level			
Total # of States or Territories with this licensure level	Total # of States or Territories Requiring the ASWB Exam	Total # of States or Territories with an Alt Pathway	Total # of States or Territories Using a Law Exam
42	37	1	4
Master Level			
Total # of States or Territories with this licensure level	Total # of States or Territories Requiring the ASWB Exam	Total # of States or Territories with an Alt Pathway	Total # of States or Territories Using a Law Exam
50	40	1	6
Clinical License Level			

Total # of States or Territories with this licensure level	Total # of States or Territories Requiring the ASWB Exam	Total # of States or Territories with an Alt Pathway	Total # of States or Territories Requiring a Law Exam	Total Number of States or Territories Law Exam for Endorsement Only	Total # of States or Territories Requiring a Law Course
51	51	2	9	2	2

The next section of the report will outline the efforts and initiatives undertaken by other states in developing alternative pathways for social work licensure. While numerous states are currently addressing this effort since the ASWB Pass Rate Report, it appears that Illinois and Minnesota have implemented an alternative pathway; however, in this section, additional states with published plans are also included as well.

Illinois

Through the Illinois Department of Financial and Professional Regulation (IDFPR), Illinois has established an alternative pathway for individuals who have failed the ASWB exam and choose to take an alternative path. The alternative path details listed below are in addition to the clinical hours required to take the exam initially.

- If an individual fails the ASWB exam, they have the option of completing an additional 3,000 hours of clinical experience, which can be supervised by a Licensed Clinical Social Worker, Licensed Clinical Professional Counselor, Licensed Marriage and Family Therapist, Licensed Clinical Psychologist, Licensed Psychiatrist, or Licensed Advanced Practice Psychiatric Nurse.
- The exam attempt must have been made since 1/1/2019
- The exam alternative hours must not be more than 10 years old.

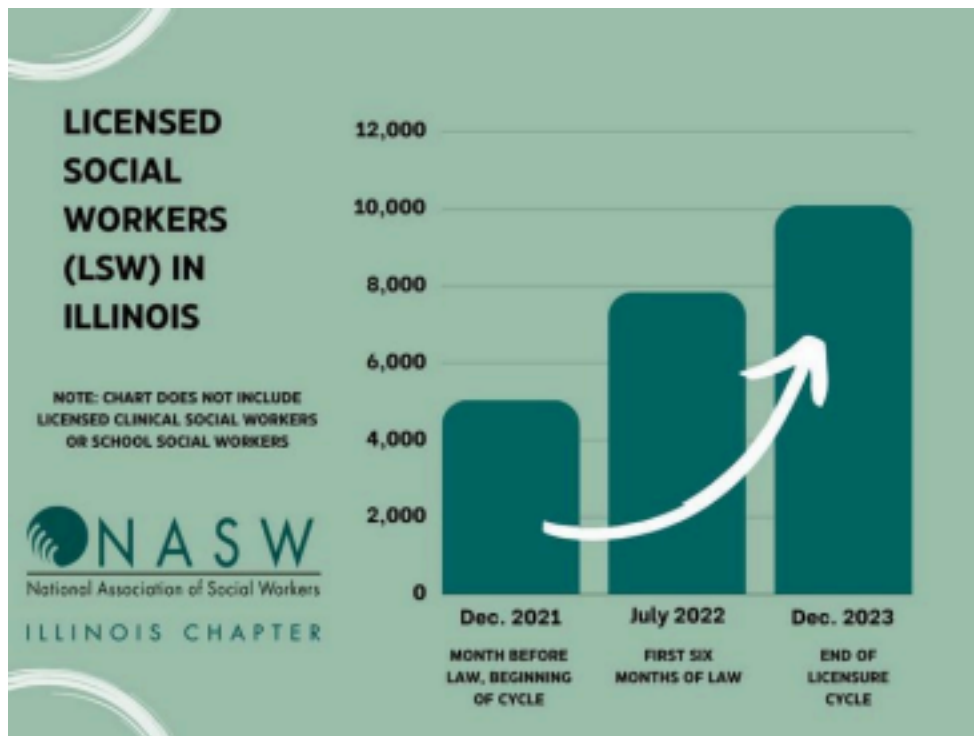
In addition to the information about the alternative pathways, Illinois publishes data showing the model's impact related to disciplinary action and the workforce.

Social Worker Initials	Year of Initial Licensure	Year of Sanction	Years Licensed Prior to Sanction
CD	2009	2019	10
SY	1992	2019	27
CS	1991	2019	28
CL	1991	2019	28
DC	1991	2021	30
KB	2020	2022	2
JG	2015	2022	7
PD	2014	2023	9
AW	2017	2023	6
ER	2017	2024	7
QC	2022	2024	2
BC	2015	2024	9

LM-N	2022	2024	2
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- Total number of sanctions per year:
 - 2019 – 4
 - 2020 – NA
 - 2021 – 1
 - 2022 – 2
 - 2023 – 2
 - 2024 – 4
- Average number of years that an individual had been licensed before being sanctioned is 12.85 years.
- The number of sanctions in 2024 is the highest it has been since 2019; however, none of the social workers who received a sanction in 2024 received their license under the Alternative Pathway Model (which was implemented on January 1, 2024)

While the information does not directly relate to the clinical level of licensure, the graphic below shows the increase in the LSW workforce since the removal of the ASWB exam. This information can be used to predict the increase in clinical social workers.



Minnesota

Minnesota has established a Provisional Licensed Independent Clinical Social Worker (LICSW). This process went into effect as of October 1, 2024. Individuals are not required to take the ASWB exam if they complete the process identified below.

- Academic Degree: Complete a master's degree in social work from a program accredited by the Council on Social Work Education (CSWE) or the Canadian Association of Schools of Social Work.
- 360 Clinical Clock Hours: Individuals must have completed courses from an institution of higher learning in the following areas (totaling 360 total hours of course work)
 - Differential Diagnosis and biopsychosocial assessment, including normative development and psychopathology across the life span (108 hours)
 - Assessment-based clinical treatment planning with measurable goals (36 hours)
 - Clinical intervention methods informed by research and current standards or practice (108 hours)
 - Evaluation Methodologies (18 hours)
 - Social work values and ethics, including cultural context, diversity, and social policy (72 hours)
 - Culturally specific clinical assessment and intervention (18 hours)
- Criminal Background Check
- Ethical Standards: Individuals must not have engaged in conduct in violation of the board's ethical standards of practice.
- Supervised practice: Individuals must submit documentation of the following
 - 200 hours of supervision over 4,000 to 8,000 hours of clinical practice
 - Hours must include 1,800 direct clinical contact hours
- Fees: Individuals must pay a total of \$108.25 for the provisional application

Texas

Texas is currently working to reinstate the statute, which provides an alternative pathway using the Alternative Method of Exam Competency (AMEC) Requirements. This alternative pathway was in place but removed in 2019 during a transition of the Texas Board of Social Worker Examiners to the Behavioral Health Executive Council. The AMEC process is in place for individuals who have failed the ASWB exam. This process includes the following:

- Complete professional portfolio
- Quarterly evaluations from a licensed supervisor
- 11 papers specific to core content within social work practice
- Case analysis of work with a client during this period
- Self-evaluation

Oregon

In April of 2024, the Oregon Board of Licensed Social Workers (OBLSW) established the Oregon Alternative Pathways to Social Work Committee. The recommendations made to the OBLSW are as follows:

- Abolish the use of the ASWB exam for all licensure levels.
- Rather than establishing an “alternative pathway,” they have recommended that a new path be established that does not involve the use of taking a standardized test at all.

No other publications have been found that identify any additional information about the status of the recommendations or the specific plans for the new pathway to licensure in Oregon.

Michigan

(UPDATE: Michigan is discussing using a jurisprudence exam to replace the ASWB exam)

Michigan is looking to join the 9 states that have included a jurisprudence exam in addition to the ASWB exam—the jurisprudence exam tests for knowledge of state law and ethics.

Virginia

Virginia’s legislators have removed “ASWB Exam” from the language related to the licensure process and simply replaced it with “Exam” which opens the door for the state to explore other potential options; however, no other information has been found indicating any other changes in the states’ licensure process.

Utah

(UPDATE: This section was added to the report after the presentation to the workgroup based on information provided by a Workgroup Member)

Utah is creating an alternative pathway for certain licensures through increased direct client care hours and supervised clinical hours instead of examination requirements;

Utah Created “Behavioral Health Board - Advisory Committees.” Below are the responsibilities of the board:

- recommend to the appropriate legislative committee statutory changes to:
- recommend to the appropriate legislative committee statutory changes to remove

The following advisory committees to the board:

- Qualifications and Professional Development Advisory Committee;
- Background and Investigations Advisory Committee
- Probation and Compliance Advisory Committee

The committee is responsible for:

- recommend evidence-based ongoing professional development requirements for
- ensure an adequate workforce to meet consumer demand; and

- prevent harm to the health, safety, and financial welfare of the public;
- advise the division on the licensing, renewal, reinstatement, and re-licensure of internationally trained applicants;
- applicants applying via licensure by endorsement; and
- applicants applying using an alternate pathway to licensure, including a non-exam

Details on Utah’s Alternative Pathway

Qualifications for licensure or certification as a clinical social worker, certified social worker, and social service worker.

Pass the examination requirement established by the rule under Section [and] or

1. Satisfy the following requirements:
 - a. document at least one examination attempt that did not result in a passing score;
 - b. document successful completion of not less than 500 additional direct client care hours, at least 25 of which are direct clinical supervision hours, and at least five of which are direct observation hours;
 - c. submit to the division a recommendation letter from the applicant's direct clinical supervisor; and
 - d. submit to the division a recommendation letter from another licensed mental health therapist who has directly observed the applicant's direct client care hours and who is not the applicant's direct clinical supervisor

Nine states using the jurisprudence exam in addition to the ASWB Examination

The nine states listed below use the jurisprudence exam and the ASWB exam. Some of the states are currently discussing removing the ASWB exam and solely using the jurisprudence exam.

California
Nebraska
Texas

Colorado
New Mexico
Vermont

Indiana
Oregon
Wisconsin

Conclusion and Next Steps

Overall, there are five general approaches that other states have taken as an Alternative Pathway toward clinical licensure for social workers:

- Individuals must take the exam once. If unsuccessful, they may complete additional hours or supervised clinical work (Illinois)
- Individuals may choose not to take the exam and apply using an alternative pathway (Minnesota)

- Rather than an “Alternative Pathway,” all individuals will obtain their licensure through a new pathway to be determined (Oregon)
- Implement an Alternative Method of Exam Competency (Texas)
- Remove the ASWB exam and replace with a jurisprudence exam which focuses on law and ethics (Nine states listed above)

The next steps in the workgroup’s process will involve each member completing a survey provided by CMAG & Associates LLC, offering the opportunity to evaluate and choose which alternative pathway(s) they believe will best serve Maryland and why. The survey link will be distributed on October 30, 2024, and must be submitted no later than 5 PM on November 6, 2024. The results will be reviewed during a special workgroup meeting scheduled for November 13, 2024, providing a platform for in-depth discussion and alignment on the preferred options. A final vote will take place on November 20, 2024, in preparation for submitting the workgroup's recommendations to the Maryland State General Assembly by December 1, 2024. It is important to note that the final recommendations will acknowledge that additional topics related to the implementation of these pathways will need to be addressed. The workgroup’s responsibilities will not conclude with the submission of the report; they will continue developing a detailed implementation plan, ensuring a smooth transition and effective adoption of the new licensure pathways.

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Appendix E: CMAG & Associates LLC Workgroup Survey Report



On October 30, 2024, The CMAG Team presented to the Workgroup the alternative pathways currently in use by various states. In addition, CMAG provided a survey for all Workgroup Members related to the Alternative Pathways and the recommendations provided during the presentation by the Maryland Board of Social Work Examiners.

The survey link was provided to all 22 Workgroup members. 20 Workgroup members participated in the survey. Below is a general analysis of the findings of the survey:

Data Analysis:

- 90% (18) of the participants said Yes to all 3 recommendations from the Maryland Board of Social Work Examiners
- 90% (18) of the participants who said Yes to at least 1 alternative pathway
- 85% (17) of the participants said Yes to either Illinois or Minnesota
- 80% (16) of the participants said Yes to 2 or more types of alternative pathways
- 10% (2) of the participants did not like any of the Alternative Pathways
- 85% (17) of the participants used one or more opportunities to comment throughout the survey.
- 50% (10) agree with the Illinois Alternative Pathway
- 65% (13) agree with the Minnesota Alternative Pathway
- 40% (8) agree with the Texas Alternative Pathway
- 60% (12) agree with the Oregon Alternative Pathway
- 55% (11) agree with the Michigan Alternative Pathway

General Comments (from the last question of the survey)

- Many individuals spoke of the importance that any alternative pathway should not be punitive or cost prohibitive to the individuals seeking licensure.
- Many individuals spoke of liking the idea of people having more than one option for licensure.
- Multiple individuals stated that they are concerned that there has not been enough discussion or a formal vote about the idea of establishing an alternative pathway for clinical licensure. In addition, an individual expressed concern about how the research on alternative pathways was conducted.
- Some individuals provided additional options or ideas for discussion:
 - Incentives for clinical supervisors
 - Free exam prep classes
 - Test taking skills classes
- Multiple individuals expressed their appreciation of the survey and looking forward to results providing an opportunity for further discussion.

- The topic of still needing to address the bias analysis in the final report was raised. In addition, others spoke of the need for state funded research to assess the demographics of those seeking licensure.
- Concerns about the removal of a competency exam was addressed, especially in comparison to other boards in the state.

DETAILED RESULTS FROM EACH ALTERNATIVE PATHWAYS

A brief summary of each Alternative Pathways, recommendations from the Maryland Board of Social Work Examiners, and the results of the Workgroup survey are provided in this next section.

ILLINOIS (50% Agree)

Alternative Pathway

Through the Illinois Department of Financial and Professional Regulation (IDFPR), Illinois has established an alternative pathway for individuals who have failed the ASWB exam and choose to take an alternative path. The alternative path details listed below are in addition to the clinical hours required to take the exam initially.

- If an individual fails the ASWB exam, they have the option of completing an additional 3,000 hours of clinical experience, which can be supervised by a Licensed Clinical Social Worker, Licensed Clinical Professional Counselor, Licensed Marriage and Family Therapist, Licensed Clinical Psychologist, Licensed Psychiatrist, or Licensed Advanced Practice Psychiatric Nurse.
- The exam attempt must have been made since 1/1/2019
- The exam alternative hours must not be more than 10 years old.

Workgroup Survey Results

Number of people who AGREE with this Alternative Pathway	Number Workgroup members who DISAGREE with this Alternative Pathway
10	10
Comments Summary:	
<ul style="list-style-type: none"> • Multipole individuals spoke of the importance of ensuring that other barriers are addressed whether this or another alternative pathway is chosen. • Determine the number of additional hours for this alternative pathway. Potentially less that the 3000 hours required in Illinois. • The ASWB exam still needs to be assessed even if an alternative pathway is put into place. • If additional supervision hours are required for an alternative pathway, the funding for those hours should be addressed to assist individuals who must pay for clinical supervision themselves. 	

- Multiple people spoke of the importance of Clinical supervision requiring a more standardized approach including continuing education for supervisors.

MINNESOTA (65% Agree)

Alternative Pathway

Minnesota has established a Provisional Licensed Independent Clinical Social Worker (LICSW). This process went into effect as of October 1, 2024. Individuals are not required to take the ASWB exam if they complete the process identified below.

- Academic Degree: Complete a master’s degree in social work from a program accredited by the Council on Social Work Education (CSWE) or the Canadian Association of Schools of Social Work.
- 360 Clinical Clock Hours: Individuals must have completed courses from an institution of higher learning in the following areas (totaling 360 total hours of course work)
 - Differential Diagnosis and biopsychosocial assessment, including normative development and psychopathology across the life span (108 hours)
 - Assessment-based clinical treatment planning with measurable goals (36 hours)
 - Clinical intervention methods informed by research and current standards or practice (108 hours)
 - Evaluation Methodologies (18 hours)
 - Social work values and ethics, including cultural context, diversity, and social policy (72 hours)
 - Culturally specific clinical assessment and intervention (18 hours)
- Criminal Background Check
- Ethical Standards: Individuals must not have engaged in conduct in violation of the board’s ethical standards of practice.
- Supervised practice: Individuals must submit documentation of the following
 - 200 hours of supervision over 4,000 to 8,000 hours of clinical practice
 - Hours must include 1,800 direct clinical contact hours
- Fees: Individuals must pay a total of \$108.25 for the provisional application

Workgroup Survey Results

Number of people who AGREE with this Alternative Pathway	Number Workgroup members who DISAGREE with this Alternative Pathway
13	7
Comments Summary:	
<ul style="list-style-type: none"> ● I am open to Minnesota's alternative pathway #2 option but I have concerns about the expense of paying for supervision. There should be waivers to cover 	

the cost for those who demonstrate financial hardship. Access must be equitable.

- Under this scenario, those who think their test taking skills are strong have access to a less time-consuming and likely less expensive pathway.
- It seems like there could be additional barriers/challenges on this alternative pathway if an applicant does not yet have a job/is unemployed, unless they are offered it through their employer.
- The bill to add the provisional path in MN was only effective several months ago. It's too soon to understand the unintended consequences for the public & profession.
- I prefer this option, ASWB is harmful to those taking the exam and does not measure social work competency.
- I believe that the additional hours need to equate what has already been achieved throughout Masters level school.

TEXAS (40% Agree)

Alternative Pathway

Texas is currently working to reinstate the statute, which provides an alternative pathway using the Alternative Method of Exam Competency (AMEC) Requirements. This alternative pathway was in place but removed in 2019 during a transition of the Texas Board of Social Worker Examiners to the Behavioral Health Executive Council. The AMEC process is in place for individuals who have failed the ASWB exam. This process includes the following:

- Complete professional portfolio
- Quarterly evaluations from a licensed supervisor
- 11 papers specific to core content within social work practice
- Case analysis of work with a client during this period
- Self-evaluation

Workgroup Survey Results

Number of people who AGREE with this Alternative Pathway	Number Workgroup members who DISAGREE with this Alternative Pathway
8	12

Comments Summary:

- The overwhelming feedback on path that Texas has taken is that there is not enough information to chose this pathway.
- Individuals who agree with this Alternative Pathway agree that an entirely new process should be developed; however, others have expressed concern that another process would still include some form of testing which may still be problematic.

- Multiple people stated that whatever process is chosen, it should be well researched and should include more than just the exam.
- While there is discussion about whether to re-instate the AMEC process in Texas, if this Alternative Pathway is to be considered, the workgroup should get a better understanding of why it was initially repealed.
- Multiple individuals spoke about various education models including short 4-10 week courses,

OREGON (60% Agree)

Alternative Pathway

In April of 2024, the Oregon Board of Licensed Social Workers (OBLSW) established the Oregon Alternative Pathways to Social Work Committee. The recommendations made to the OBLSW are as follows:

- Abolish the use of the ASWB exam for all licensure levels.
- Rather than establishing an “alternative pathway,” they have recommended that a new path be established that does not involve the use of taking a standardized test at all.

No other publications have been found that identify any additional information about the status of the recommendations or the specific plans for the new pathway to licensure in Oregon.

Workgroup Survey Results

Number of people who AGREE with this Alternative Pathway	Number Workgroup members who DISAGREE with this Alternative Pathway
12	8

Comments Summary:
<ul style="list-style-type: none"> • Many people stressed the importance of ensuring that the cost of the process to get licensed does not become an additional barrier for individuals who are financially disadvantaged. • Multiple people spoke of the additional burden that this method may place on the Maryland Board of Social Work Examiners. Individuals also stated that the needs of BSWE needs to be considered no matter which pathway is chosen. • Additional people spoke of the need for addressing the staff needs of the BSWE to fulfill the requirements of any of the pathways chosen. • Many individuals welcome the idea of developing a new, fair, and equitable process. Also individuals spoke of the importance of experience over the exam.

MICHIGAN (55% Agree)

Alternative Pathway

There are 9 states throughout the country that use a Jurisprudence exam which focuses on law and ethics in addition to the ASWB exam. Michigan is discussing the possibility of replacing the ASWB exam with a Jurisprudence exam.

Workgroup Survey Results

Number of people who AGREE with this Alternative Pathway	Number Workgroup members who DISAGREE with this Alternative Pathway
11	9
Comments Summary:	
<ul style="list-style-type: none"> ● Most of the comments related to this pathway were reiterating their agreement of this pathway. ● Many individuals spoke of the importance that the jurisprudence exam should be focused on social work ethics and the laws here in Maryland. ● Some individuals stated the importance of coupling a jurisprudence exam with additional supervision if chosen as an alternative pathway. ● It was stated that a jurisprudence exam may remove the bias that can be found in other exams. ● Individuals not in support of this Alternative Pathway are concerned that this type of exam does not assess evidence-based practice standards etc. In addition, the challenges that some individuals may face with standardized testing may still be present with a jurisprudence exam. 	

**MARYLAND BOARD OF SOCIAL WORK EXAMINERS
RECOMMENDED CHANGE IN TESTING PROCESS**

Change #1:

Reduce the amount of time before an individual can re-take the exam. (the current wait time in Maryland is 90 days)

Workgroup Survey Results

Number of people who AGREE with this recommendation	Number Workgroup members who DISAGREE with this recommendation
18	2
Comments Summary:	
<ul style="list-style-type: none"> ● Access to data that would allow a thorough assessment of the test's fairness would likely reveal that challenges posed by the exam may be more pervasive and impact a broader range of applicants. ● An individual should be allowed to retake the exam (at no cost) as soon as they feel ready (and as many times as needed). Eliminate wait time. ● The time frame to retake the exam should be reduced from 90 days to 30 days. ● ASWB already administers a process to waive the 90-day wait period. 	

- I also believe the retesting fee should be reduced for those who fail by 1-10 points. Since the ASWB exam discards 20 questions, it's possible some are effectively passing but lose needed points due to discarded questions.

Change #2:

Wave fees for re-testing.

Workgroup Survey Results

Number of people who AGREE with this recommendation	Number Workgroup members who DISAGREE with this recommendation
19	1
Comments Summary:	
<ul style="list-style-type: none"> • Access to data that would allow a thorough assessment of the test's fairness would likely reveal that challenges posed by the exam may be more pervasive and impact a broader range of applicants. • There should be a one-time fee. There should also be a reduction in the fee for individuals who can demonstrate financial hardship. No retesting fees. • The Maryland licensing board first needs to guide this decision to understand impacts on operations from a fee waiver. • If alternative pathways are available, I do not agree with waiving fees. • There should be waived fees if the test taker failed between 1-10 points 	

Change #3:

Individuals unsuccessful in passing the ASWB exam will only have to re-take the section(s) they did not pass (similar to the Certified Public Accountant Exam)

Workgroup Survey Results

Number of people who AGREE with this recommendation	Number Workgroup members who DISAGREE with this recommendation
19	1
Comments Summary:	
<ul style="list-style-type: none"> • Access to data that would allow a thorough assessment of the test's fairness would likely reveal that challenges posed by the exam may be more pervasive and impact a broader range of applicants. • Free study materials to assist in retaking the exam should be provided and there should not be an additional cost. • If there is an exam requirement I agree with only retaking the section that was failed • ASWB is already working to modularize the exam. This is not a decision for the Workgroup to make, and it is not up to Maryland if they wanted to make the change. ASWB is committed to reducing barriers to licensure and helping to assure the process is fair and equitable for all. 	

- The Board is concerned that a drastic change to how we assess minimal qualifications for licensing individuals will have an impact on both citizens and those Social Workers who are already licensed through the exam to practice.

Appendix F: Recommendations from the Subgroups

Subgroup Interim Report and Final Report Recommendations

Policy Subgroup Recommendations

Recommendation 1: Equitable access for licensure

To support and mitigate the stress of the board and those seeking licensure, the subcommittee recommends a relaxation on the waiver for the time it takes to retest. For individuals who are within a 10% margin, they should be able to retest within 45 days without being assessed another fee. It should be noted that this may require an agreement between the state and ASWB to ensure that the individual does not require additional petitioning to the board for approval.

Recommendation 2: Continue the conversation about testing requirements:

The subcommittee recommends continued exploration and research for at least six months to establish a consensus about whether testing requirements should be eliminated at the bachelor's or master's level(s). The subcommittee would like to consider following neighboring states that are exploring the same pathway and potential legislation around the Social Work Licensure Compact and continue discussion with the subcommittee and larger Workgroup. We would like the opportunity to have that regional discussion before we establish a full policy recommendation in this area.

Recommendation 3: Improve Testing Accessibility:

The subcommittee recommends that policies be created regarding any testing that is implemented. All testing should have multiple languages, including American Sign Language, and other testing requirements should be considered low barriers to accommodate and provide accessibility and inclusion for individuals testing with disabilities. I think this recommendation also includes what you said, Madam Chair, around plain language to accommodate and provide accessibility and inclusion for all individuals with testing disabilities, and we feel that that should be a standardized policy that we're utilizing and that these requirements be included not only in the process of licensure but also in the process of applying to be licensed in the state of Maryland.

Testing Subgroup Recommendations

Recommendation 1: Eliminate the use of the ASWB exam as a requirement for licensure as an LBSW and LMSW. Consider instead, an alternative (inclusive pathway to licensure that involves several reliable components such as:

1. Increase number of 1:1 supervision hours provided by board approved, licensed clinical social worker (see recommendation in later section on mitigating financial burden)

2. Graduating from a CSWE accredited Social Work program
3. Complete a specified number of supervised practice hours
4. Satisfying a background check; and
5. Ongoing completion of highly accredited CEUs (also need to consider additional financial burden resulting from lower earning potential while in provisional status)

Recommendation 2: If LBSW and LMSW exam is continued, consider the following recommendations:

1. 3-year moratorium on all exams to allow adequate time for additional inquiry to explore and eliminate disparities in the current exam. This should include getting data independent of ASWB to ensure a thorough review of the exam.
2. Explore alternate exam vendors that will allow a selection of broader options for test takers.
3. Approved test vendor(s) should make all LBSW/LMSW examination prep materials free.
4. There should be a single fee for the exam (no fee for retest)
5. Approved test vendors should provide an annual report of pass rates based on intersecting identities including race, age, disability, gender etc.
6. Truncate the 90-day limit between testing attempts
7. Provide specific feedback on incorrect answers and allow test takers to only retake the section of the exam that they did not pass.
8. After one failed attempt, allow the option of selecting an alternative pathway to licensure described above.
9. Adopt point waiver system that allows test takers an established range to receive a pass outcome. The point waiver should be retroactive for review and consideration of the test takers who met the established criteria within the past 7 years.
10. Considerations for Deaf and Hard of Hearing Colleagues should include:
 - a. Ensure that interpreters are well-versed in social work terminology, testing environments in addition to being bilingual ASL-English translations.
 - b. Higher point waivers to account for potential interpretation challenges
11. Streamlined process to support testing accommodations for disabled test takers.
12. Offer exam versions in multiple languages.
13. Following elimination of racially biased content, exam questions should include a maximum of 3 multiple choice options.
14. Establish an ongoing task force to maintain accountability by monitoring variables that contribute to identified disparities in pass rates.
15. There should be clear communication regarding conditions and results or the required background check PRIOR to test takers sitting for the exam.

Recommendation 3: As an alternative to the current test, provide a jurisprudence exam based solely on objective laws and regulations in the state of Maryland.

Recommendation 4: A provisional/temporary license would counter chronic workforce shortages and lack of representation in various social work settings. It would also increase earning potential and opportunity for underrepresented groups in social work settings. As noted above, an alternative pathway would include:

- a. Increased supervision hours provide by board approved, licensed clinical social worker (see recommendation in later section on mitigating financial burden). This would be in addition to meeting the requirement of graduating from a CSWE accredited university.
- b. Completing a specified number of supervised practice hours.
- c. Satisfying the background check.
- d. Provisional licensure for LBSW and LMSW (without examination) could also include ongoing completion of highly regulated CEUs (also need to consider additional financial burden resulting from lower earning potential).

Recommendation 5: Allow board approved licensed clinical supervisors to receive Category II CEU Credit in exchange for providing supervision hours to LBSWs/LMSWs at no cost. This recommendation would mitigate the mutual financial burden for the supervisor and supervisee.

Recommendation 6: Consider an incentive that could be provided to employers who offer access to board approved supervisors which would eliminate the additional out of cost expense for test takers.

Testing Barriers Recommendations

At this time, the group does not have consensus on recommendations related the testing requirement for all levels of licensure . We discussed the various supports ASWB offers to test takers and educators and generally identified that there may be a need to educate more broadly on the resources currently available. Dr. Mouny discussed the importance of supervisors having access to the practice exam to help prepare supervisees. ASWB has taken a concrete measure of implementing a program called Fifth Theory, which is a resource to help those that do not pass the test. Applicants that do not pass will be sent information on this within a week of failing an exam. Test-taking support - Association of Social Work Boards (aswb.org). ASWB should make it clear in its study materials about the format of the exam questions and the types of questions that are asked.

Discussion re. inconsistency in degree programs; CSWE needs to take a closer look at what is happening in programs e.g., Fordham MSW program. Recommendations for research/further study or for further discussion with the full workgroup:

1. Dr. Mouny asks ASWB to consider working with Gallaudet University.
2. Dr. Mouny is willing to work with ASWB to do a small-scale study with individuals having a hard time passing the exam. She thinks we need to go to the populations that are being disproportionately affected and do qualitative

investigations using sample/practice tests, or perhaps allowing participants to take the actual test, and to make notes about their experiences with specific items, item types, etc. which would then be collected and discussed at the interview.

3. Ms. Sanner asks the workgroup to monitor the current research underway at ASWB and by independent researchers for specific implications for Maryland.

Universities Recommendations

Recommendation 1: To Senate and Subcommittee:

To facilitate transparency and informed decision-making regarding social work licensure policies consider the following recommendations: Provide resources to create a database with the following:

- Summary of each U.S. State and Canadian Providence processes for social work licensure
- Pending legislation or efforts to changes policies in states and Canada.
- Implications of Interstate Compact and testing requirements

Rationale: This database will enable the Workgroup, jurisdiction authorities, and aspiring social workers to make data-driven decisions regarding licensure policies. Centralizing this information in one location will improve accessibility and allow for easier cross-jurisdictional comparisons.

General Recommendation for ASWB Exams:

Recommendation 1: To ensure the ongoing efficacy and fairness of the ASWB exams, consider the following recommendation: A third unbiased set of test experts should review the exams and the procedures for creating them and provide a detailed report regarding its efficacy, reliability, and validity, including predictive validity. ASWB should pay for this review as a good faith gesture.

Rationale: Periodic independent review by unbiased experts will help ensure the exams accurately and equitably assess competence for licensure. ASWB funding the review demonstrates commitment to an impartial process, while having the panel report directly to independent oversight maintains the integrity of findings.

SB 871 (Chapter 228) Interim Report Requirement (i) Whether to continue to use examinations developed by the Association of Social Work Boards as a requirement for a Bachelor Social Worker license or a Master Social Worker license.

Subgroups Interim Report DRAFT Recommendations- February 2024 Workgroup for Social Work Licensure Requirements

Recommendation 2: To address concerns about the equity of current ASWB Bachelor's and master's exams, consider the following recommendations:

1. Discontinue the ASWB exam requirement entirely.
2. If not #2, allow those who want to take the ASWB exam to do so and create an alternative pathway for others to be licensed.
3. Additional supervision or CEUs, although we need to be cautious to not create additional barriers.

Rationale: There are outstanding questions about the fairness of these exams that warrant reconsidering their mandated use. Pausing their required status could allow time to address concerns. Alternate pathways would provide options for those who cannot pass the exams despite having the required knowledge and skills.

Recommendation 3: To ensure equitable access to Clinical licensure (LCSW-C Exams), consider the following recommendations:

Consider Illinois as a model.

1. Allow those who want to take the ASWB exam to do so.
2. AND create an alternate pathway for those who do not wish to take the exam to become licensed. Illinois did this by extending the required hours by DOUBLE, which means that folks who don't take the exam have to stay at the LM level for twice as long which has major financial implications.

Rationale: The Illinois approach demonstrates a potential compromise that maintains testing access while creating alternatives that do not unduly disadvantage those unable to pass the ASWB exam.

Appendix G: Interim Report

**Workgroup on Social Worker Requirements for Licensure:
Interim Report**

As Required by Senate Bill 871 (2023)



Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Secretary

August 23, 2024

The Honorable Pamela Beidle
Chair, Senate Finance Committee
Miller Senate Office Building, 3 East
Annapolis, MD 21401-1991

The Honorable Joseline A. Peña-Melnyk
Chair, House Health and Government Operations
Room 241, House Office Building
Annapolis, MD 21401-1991

RE: Workgroup on Social Worker Requirements for Licensure Interim Report- (MSAR# 14874)

Dear Chairs Beidle and Peña-Melnyk:

Senate Bill 871 (SB 871)/Chapter 228 (2023) established the Workgroup on Social Worker Requirements for Licensure (the Workgroup) and required the Maryland Department of Health (Department) to staff the Workgroup, which shall submit its report to the General Assembly in accordance with Article - State Government § 2-1257, Annotated Code of Maryland.

The interim report of the Workgroup includes findings and recommendations on the following:

- Whether to continue to use examinations developed by the Association of Social Work Boards (ASWB) as a requirement for a bachelor social worker license or a master social worker license (LBSWs/LMSWs);
- Whether to establish a temporary license for applicants for LBSWs/LMSWs who meet the education and experience requirements for a license to practice bachelor of social work or master of social work under Title 19 of the Health Occupations Article;
- Examine how supervision may be provided to BSWs/LMSWs licensees at no cost to the licensees; and
- If the Workgroup determines under item one that the examinations developed by the ASWB should not be used or temporary licenses should be established, whether additional experience or education requirements are necessary.

The Workgroup on Social Worker Requirements for Licensure membership respectfully submits this interim report. The Workgroup membership viewed the report's findings and recommendations as important first steps in responding to disparities across race, age, and language in the passage rate for the Social Work Licensure Examinations; and eliminating bias to ensure the process for licensing social workers in the State is fair, diverse, and efficient.

The Workgroup recommends the elimination of ASWB Exam as a requirement for a LBSWs/LMSWs, but should remain as a requirement for Advanced Clinical Master Social Worker License (LCSW-C), and an alternative (inclusive) pathway to licensure should be considered that involves several components including degrees obtained from Council on Social Work Education (CSWE) accredited undergraduate programs of Social Work. The Workgroup also recommends a temporary license for LBSWs/LMSWs applicants as part of the grandfathering process.

The Workgroup recommends the Maryland Board of Social Work Examiners allows licensed clinical supervisors to receive Category II CEU credit provided through the Behavioral Health Administration at the Department in exchange for providing supervision to LBSWs/LMSWs at a reduced cost to mitigate mutual financial burden for both supervisor and supervisee; incentive employers to offer access to board approved supervisors; and permit supervision to be completed virtually to enhance access to supervisors.

If a provisional license is established, the Workgroup recommends the experience or education requirements may include four hours per month of supervision and current regulations on supervision continue to apply for LBSWs/LMSWs. For an advanced clinical social worker license, the individual must be a licensee for 2 years with supervised experience of at least 3,000 hours, and a minimum of 100 hours of periodic face-to-face supervision in the practice of social work.

The Workgroup's final report is due on December 1, 2024. The Workgroup intends to submit the report to the General Assembly prior to the due date; however, we note that the bias analysis required by the legislation will not be complete by this time as it needs to be independently procured. I would welcome a discussion with you and the Department to clarify any details regarding content, timing, and procurement of the bias analysis.

If you have any questions or comments concerning the report, please contact Sarah Case-Herron, Director, Office of Governmental Affairs at the Maryland Department of Health, at sarah.case-herron@maryland.gov.

Sincerely,



Karla J. Abney, MSW, MSN, LMSW
Chair, Workgroup on Social Worker Requirements for Licensure

cc: Laura Herrera Scott, M.D., M.P.H., Secretary of Health
Karen Richards, LCSW, Executive Director, Board of Social Work Examiners
Marie Grant, J.D., Assistant Secretary of Health Policy

Sarah Case-Herron, J.D., Director, Office of Governmental Affairs
Nilesh Kalyanaraman, MD, FACP, Deputy Secretary, Public Health Services
Kimberly Hiner, MPH, Director, Office of Population Health Improvement
Sarah Albert, Department of Legislative Services (5 copies) (MSAR# 14874)

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The recommendations in this report reflect the opinions of the majority of the members of the Workgroup on Social Work Licensure Requirements and do not necessarily reflect opinions of the Maryland Department of Health.

Executive Summary

The Workgroup on Social Worker Requirements for Licensure, authorized by SB0871 convened their first meeting on Tuesday, October 24, 2023 at the Maryland State House in Annapolis Maryland.

Per the Bill, the Workgroup was charged with determining:

- I. Whether to continue to use examinations developed by the Association of Social Work Boards (ASWB) as a requirement for a Bachelor Social Worker license or a Master Social Worker license;
- II. Whether to establish a temporary license for applicants for a Bachelor Social Worker license or Master Social Worker license, who, except for passing the required examination, meet the education and experience requirements for licensure;
- III. How supervision may be provided to Bachelor Social Worker licenses and Master Social Worker licensees at no cost to licensees; and
- IV. If the Workgroup determines that the ASWB examination should not be used or that temporary licenses should be established whether additional experience or education requirements are necessary.
- V. a timeline for phasing in any determinations made under item (i), (ii), (iii), or (iv) of this item; and
- VI. an outline and timeline for conducting the study required in subsection (h) of this section

Due to unforeseen delays in identifying members and convening the Workgroup until October of 2023, several milestones of the Bill were not attained, including submission of a preliminary report of its findings and recommendations by September 1, 2023, which was instead submitted on December 31, 2023. This Interim Report, delayed from December 1, 2023 to May 31, 2024 contains a timeline for phasing in any determinations made pursuant to the findings of the preliminary report, and an outline and timeline for conducting a specified study.

Per the Bill, the Workgroup will conduct a study to examine each type of license under the Maryland Social Workers Practice Act (Title 19 of the Health Occupations Article) by;

- Conducting a bias analysis of the qualifications for each type of license;
- Determining whether each type of license is necessary;

- Identifying alternatives to examination requirements that may be used to assess an applicant's qualifications for each type of license;
- Considering examination testing options, as specified;
- Identifying barriers in addition to the examination that present challenges to licensure in the State; and
- Identifying the circumstances under which unlicensed individuals work in state and federal government positions as Social Workers.

The Workgroup has requested an extension for the submission of the final report from December 31, 2024 to May 31, 2025, which is one year from the submission date of the Interim Report. This extension will allow for the completion of a bias analysis, and submission of a report to the Senate Finance Committee and the House Health and Government Operations Committee on its findings from the study recommendations to eliminate bias and make the process for licensing Social Workers in the State more fair, diverse, and efficient.

Per the requirements of the Bill, the Workgroup established the following subgroups to examine topics (which is not exhaustive):

- Policy - Board of Social Work, Disability and Accommodations and Requirements
- Universities/Schools/Programs of Social Work – Curriculum, CSWE Requirements
- Testing Barriers – Cost of Preparation, Exam Fees, Testing Locations, Concerns about testing barriers to include the accommodations requesting process overall and identified concerns about how candidates are treated and the triggers for members of certain identity groups.
- Recommendations on Testing – Recommendations on continuing the use of the ASWB exam for LBSW and LMSW, Supervision, Temporary Licensure

The Workgroup is currently working with the Maryland Department of Health on a process for contracting with an entity with expertise in analyzing assessment bias, in order to provide a recommendation to eliminate bias and make the process for licensing Social Workers in the State more fair, diverse, and efficient.

- Identifying alternatives to examination requirements that may be used to assess an applicant's qualifications for each type of license;
- Considering examination testing options, as specified;
- Identifying barriers in addition to the examination that present challenges to licensure in the State; and
- Identifying the circumstances under which unlicensed individuals work in state and federal government positions as Social Workers.

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Background

SB0871 Social Workers – Sunset Extension, Notification of Complete Application, and Workgroup on Social Worker Requirements for Licensure, sponsored by Senator Mary Washington was approved by the Governor of Maryland – Chapter 228. In synopsis, SB0871 was enacted For the purpose of Continuing the State Board of Social Work Examiners in accordance with the provisions of the Maryland Program Evaluation Act (sunset law) by extending to July 1, 2025, the statutory and regulatory authority of the Board; establishing the Workgroup on Social Worker Requirements for Licensure to make certain findings and recommendations regarding the licensure of Social Workers in the State; and generally relating to the State Board of Social Work Examiners and licensure requirements for Social Workers.

Per Section 2 of SB0871, it was further enacted that there is a Workgroup on Social Worker Requirements for Licensure. The Workgroup consists of the following members:

- One member of the Senate of Maryland who is a member of the Legislative Black Caucus, appointed by the President of the Senate;
- One member of the House of Delegates who is a member of the Legislative Black Caucus, appointment by the Speaker of the House;
- The Secretary of Health, or the Secretary’s designee; the Secretary of Human Services, or the Secretary’s designee;
- The Chair of the State Board of Social Work Examiners, or the Chair’s designee;
- The Chair of the Maryland Commission on Health Equity, or the Chair’s designee;
- The Executive Director of the State Board of Social Work Examiners, or the Executive Director’s designee;
- The Director of the Governor’s Office of the Deaf and Hard of Hearing, or the Director’s designee;
- One Social Worker who is deaf or Hard of hearing and is familiar with the licensing process for deaf and hard of hearing Social Workers designated by the Maryland Association of the Deaf;
- One representative of the NAACP Maryland State Conference, designated by the President of the NAACP Maryland State Conference;
- One representative of the Baltimore Legacy Chapter of the Association of Black Social Workers, designated by the Baltimore Legacy chapter of the Association of Black Social Workers;
- One member from the Greater Washington Society for Clinical Social Work, designated by the President of the Greater Washington Society for Clinical Social Work;
- Two representatives of the Association of Social Work Boards, designated by the President of the Association of Social Work Boards; and

- The following members, appointed by the Governor; three Deans of social Work from accredited Social Work master's programs serving the State, one of which shall be from a Historically Black College or University;
- Three representatives from nongovernmental social service organizations that primarily work to support Western Maryland, Central Maryland, and the Eastern Shore; and
- Two individuals who received a Master's Degree in Social Work within the immediately preceding 10 years and who have been negatively impacted by the examination requirement for licensure under Title 19 of the Health occupations Article.
- The Governor shall designate the Chair of the Workgroup.

SB0871 was enacted as an emergency measure necessary for the immediate preservation of the public health or safety and passed by a ye and nay vote supported by three-fifths of all the members elected to each of the two Houses of the General Assembly. Section 2 of this Act shall remain effective through June 30, 2025, and at the end of June 30, 2025, Section 2 of this Act, with no further action required by the General Assembly, shall be abrogated and no further force and effect.

The Workgroup has met a total of nine times through April 30, 2024. Business conducted at each meeting included review of statutory mandates, formation of operational process, and briefings on topics that include, licensing process in the state of Maryland and surrounding jurisdictions, the exam and licensing processes for other professions, the ASWB exam, as well as from members of the Workgroup. Presenters included Judith L. Mouny, PhD, MSW, LCSW-C, LICSW, Stacey Hardy-Chandler, PhD, JD, LCSW, CEO of the Association of Social Work Boards, Jason A. Schwartz, MS, Director of Outreach, NCSBN, Laura W. Groshong, LICSW, Director, Policy, and Practice, Clinical Social Work Association (CSWA) and Joel L. Rubin, MSW, LSW, ACSW, CAE, Executive Director of the Illinois Chapter of the National Association of Social Workers (NASW).

This interim report addresses the following findings and recommendations as required in SB871 (Chapter 228) (2023).

Workgroup Members

Workgroup appointments outreach began soon after the enactment of SB 871 (Chapter 228) (2023) and was finalized in October 2023. The Workgroup consists of the following appointed members:

Table 1. Workgroup Members

Seat	Name
Chair of the Workgroup as designated by the Governor	Karla J. Abney, MSW, MSN, LMSW
One member of the Senate of Maryland, who is a member of the Legislative Black Caucus, appointed by the President of the Senate	Senator Mary Washington
One member of the House of Delegates, who is a member of the Legislative Black Caucus, appointed by the Speaker of the House	Delegate Robbyn T. Lewis
Secretary of Health, or designee	Stephanie C. Slowly, MSW, LCSW-C
Secretary of Human Services, or designee	Robin L. Harvey, LCSW
Chair of State Board of Social Work Examiners, or designee	Adrienne Ekas PhD, LCSW-C
Chair of the Maryland Commission on Health Equity, or designee	Erin S. Penniston, LMSW, Designee
Executive Director of the State Board of Social Work Examiners, or designee	Karen Richards, LCSW-C
Director of the Governor’s Office of the Deaf and Hard of Hearing, or designee	Katherine O. Breen

Seat	Name
Social Worker who is deaf or hard of hearing and is familiar with the licensing process for deaf and hard of hearing Social Workers, designated by the Maryland Association of the Deaf	Judith L. Mouny, Ed.D. MSW, LCSW-C, LICSW, LCSW
Representative of the NAACP Maryland State Conference, designated by the President of the NAACP Maryland State Conference	Philicia Ross, LCSW-C
Representative of the Baltimore Legacy Chapter of the Association of Black Social Workers, designated by the Baltimore Legacy Chapter of the Association of Black Social Workers	Christa Gilliam, MSW, Ph.D
Representative of the Maryland Chapter of the National Association of Social Workers, designated by the Executive Director of the Maryland Chapter of the National Association of Social Workers	Karessa Proctor, BSW, MSW, Executive Directive, NASW Maryland
Member from the Greater Washington Society for Clinical Social Work, designated by the President of the Greater Washington Society for Clinical Social Work	Karla J. Abney, MSW, MSN, LMSW
Two representatives of the Association of Social Work Boards, designated by the President of the Association of Social Work Boards	Dale J. Atkinson, Esq. Cara E. C. Sanner
Three Deans of Social Work from accredited social work master's programs serving the State, one of which shall be from a historically Black college or university, appointed by the Governor	Anna McPhatter, Ph.D., LCSW, Dean, School of Social Work, Morgan State University Judy Postmus, PhD, ACSW, Dean, The University of Maryland, Baltimore Linda Houser, MSW, Ph.D., Director of School

Seat	Name
	of Social Work, Salisbury University
Three representatives from nongovernmental social service organizations that primarily work to support Western Maryland, Central Maryland, and the Eastern Shore, appointed by the Governor	Temeka Bailey, LCSW-C, LICSW (Central Maryland) Kristine Garlitz, LCSW-C (Eastern Shore) TBD (Western Maryland)
Two individuals who received a master’s degree in social work within the immediately preceding 10 years and who may have been negatively impacted by the examination requirement for licensure under Title 19 of the Health Occupations Article, appointed by the Governor	Simone Bramble, LCSW-C Emanuel Wilkerson, LMSW

Workgroup Staff

Kathy Guggino, PhD, Health Policy Analyst, Office of Population Health Improvement, MDH
Samuel Paul, J.D., Senior Health Policy Analyst, Office of Governmental Affairs, MDH
(Former Staff)

Maryland Department of Health participants:

Marie Grant, JD, Assistant Secretary for Health Policy, MDH
Megan Peters, MPH, Former Acting Director, Office of Governmental Affairs, MDH
Serena Mlawsky, Intern, Office of Governmental Affairs, MDH

Subgroups

The Workgroup agreed that the most efficient way to formulate findings and recommendations mandated by SB 871 was to form four subgroups, listed below.

The Workgroup has established four subgroups to work in close partnership with community stakeholders to evaluate and assess the Social Worker Requirements for Licensure and to help inform thoughtful, impactful findings and recommendations. Please see Appendix B for the list of Subgroups, the Subgroup Chairs, and the Subgroup members.

Subgroups Roles and Responsibilities-Chair Responsibilities

- Schedule Subgroup Meetings: Subgroups are meeting at least once (monthly), as required, before the monthly full Workgroup meeting but if subgroup members wish to meet more often, then they are welcome to schedule the meetings.
- Subgroup Meeting Summaries: Before the monthly full Workgroup meeting, the subgroups are expected to provide a summary of their meetings to MDH Staff, Kathy Guggino, a week before the Tuesday Workgroup meeting to allow time to compile the summaries or notes into the meeting materials packet and send them to the Workgroup.
- Interpreters: Inform MDH Staff, Kathy Guggino, at least a week before each Subgroup meetings to allow time to schedule interpreters if needed.
- Contribution to Required Reports to include Recommendations from Subgroups.

The Subgroup focus areas are included below. These focus areas are not exclusive.

1. **Policy** - Board of Social Work, Disability and Accommodations Certification and Requirements
2. **Universities/Schools/Programs of Social Work** - Curriculum, CSWE Requirements
3. **Testing Barriers** - Cost of Preparation, Exam Fees, Testing Locations, Disability and Accommodations. Concerns about testing barriers to include the accommodations requesting process overall and identified concerns about how candidates are treated and the triggers for members of certain identity groups.
4. **Recommendations on Testing** - the mandate for this group is twofold:
 - a. First: Recommendations on whether to continue the use of the ASWB exam for the LBSW and LMSW, whether to establish a temporary license for those who meet the LBSW. LMSW requirements but have not passed the ASWB exam, how supervision could be provided to LBSWs/LMSWs at no cost to the licensees.
 - b. Second: Complete Licensure Examinations as stipulated by SB 871 Section 2, Subsection h (found on page 8 of Senate Bill 871 ([SB 871](#))).

See Appendix A for Subgroups Background Information and Meeting Information.

Workgroup Meetings

October 24, 2023: The first meeting of the Workgroup, SB871 focused on a discussion regarding what the Workgroup would like to accomplish. A schedule was created for future meetings, as well as points of discussion for the next meeting.

November 14, 2023: The meeting focused on the Association of Social Work Boards (ASWB) examination pass rates (**see Appendix B**), comparing the state of Maryland to nearby jurisdictions and nationally. There was also discussion on the National Association of Deans and Directors of Schools of Social Work (NADD) plans and position on the exam requirement. The meeting focus transitioned to comparing Social Work requirements in the other states included in HHS Region Three. The discussion then moved to states that have removed the exam requirements. The meeting finished with discussions on temporary and provisional licensure requirements.

December 5, 2023: The Workgroup meeting focused on the grandfathering licensure process and transitions to alternative licensure pathways, the Social Work application and licensure processes in the state of Maryland and surrounding jurisdictions, continuing education requirements, and the revised licensure requirements for the Licensed Independent Social Work (LISW).

December 19, 2023: The Workgroup meeting discussion focused on the fee structure for Social Work licenses, including initial fees for first time licensees which includes BSWE fees and ASWB exam and prep test fees, as well as license renewal fees, to include CEUs, comparable professions (e.g., Counselors, Nurses, and Psychologist). The discussion also focused on the cost of supervision for graduate Social Workers.

January 9, 2024: The meeting focused on Testing Barriers for the Deaf and Hard of Hearing and the Workgroup Subgroups Roles and Responsibilities. The presenter for this Workgroup was Dr. Judith L. Mounty, Ed.D. MSW, LCSW-C, LICSW, LCSW. Dr. Mounty presented on Testing Barriers for the Deaf and Hard of Hearing. The meeting focus shifted to the formation of Subgroups. Subgroups were agreed upon, including the assignment members of each subgroup. The expectations of the Subgroups are to meet monthly at least once before the Workgroup meeting occurs the last Tuesday of the month and to provide summaries of their work to the Workgroup Staff prior to the convening of the full monthly Workgroup.

January 30, 2024: The meeting focused on the ASWB exam and the NCLEX exam. The presenters for this meeting included Dr. Stacey Hardy-Chandler, CEO of the The Association of Social Work Boards (ASWB) who presented on the ASWB exam and Jason A. Schwartz, MS,

Director of Outreach, NCSBN who presented on The National Council Licensing Examination (NCLEX) exam.

February 27, 2024: The meeting focused on the Subgroups' meeting summaries and the Draft Interim Report. The Subgroup Chairs presented the Subgroup Summary Reports. The Workgroup reviewed the Draft Interim Report as required by SB 871 but were unable to finalize the report. Therefore, the Workgroup decided to take a Straw Poll Vote regarding Interim Report Question: (i) Whether to continue to use examinations developed by the Association of Social Work Boards as a requirement for a Bachelor Social Worker (BSW) license or a Master Social Worker (MSW) license. The majority vote was in favor of the elimination of the ASWB exam as a requirement for licensure at the BSW and MSW levels, however some Workgroup members were not in attendance.

March 5, 2024 (Subgroup Chairs Meeting): Chair Abney met with the Subgroup Chairs to discuss the work of the Subgroups to date, and next steps. Those next steps included identifying potentialities with the elimination of the ASWB exam as a requirement for licensure, and implementation of new processes, including increasing staffing to handle an increase in applicants, concerns with the grandfathering process, and enacting new regulations related to licensure. There was agreement that the implementation research and analysis will remain ongoing beyond the Interim report submission.

March 26, 2024: As a follow up to the February 24, 2024 Workgroup meeting, the Workgroup meeting focused on a final binding vote on Interim Report Question: (i) Whether to continue to use examinations developed by the Association of Social Work Boards as a requirement for a Bachelor Social Worker license or a Master Social Worker license. The majority vote was in favor of the elimination of the ASWB exam as a requirement for licensure at the BSW and MSW levels, including Workgroup members who were not in attendance and sent in their vote via a Google Forms poll. The Workgroup also received a presentation from Laura W. Groshong, LICSW, Director, Policy, and Practice, Clinical Social Work Association (CSWA) on the Social Work Licensure Compact.

April 30, 2024: The Workgroup focused on other states with alternate pathways to licensure for Social Workers and the finalization of the Interim Report. The Workgroup received a presentation from Joel L. Rubin, MSW, LSW, ACSW, CAE, Executive Director of the Illinois Chapter of the National Association of Social Workers (NASW) on "Breaking Down Barriers to Social Work Licensure in Illinois." The presentation included best practice and lessons learned from implementation of licensing without the ASWB exam and alternate pathway to licensing. The Workgroup reviewed the revised Interim Report Draft via Google Docs after the Workgroup meeting to make any final comments and suggested revisions.

Recommendations

(i) Whether to continue to use examinations developed by the Association of Social Work Boards (ASWB) as a requirement for a Bachelor Social Worker license or a Master Social Worker license. This recommendation was based on the majority vote of the Workgroup.

Recommendation 1: Eliminate the use of use examinations developed by the ASWB Exam as a requirement for a Bachelor Social Worker license or a Master Social Worker license. Consider instead, an alternative (inclusive) pathway to licensure that will involve several reliable components. The recommended requirements for each level of licensure are as follows :

Bachelor Social Worker license

- Obtained a degree from a CSWE accredited undergraduate program of Social Work
- Satisfy the background check.

Master Social Worker license

- Obtained a degree from a CSWE accredited graduate program of Social Work
- Satisfy the background check.
- Current regulations on supervision would still apply

Advanced Clinical Master Social Worker License (LCSW-C)

- Be a licensed MSW professional.
- Complete 2 years as a licensee with supervised experience of at least 3,000 hours with a minimum of 100 hours of periodic face-to-face supervision in the practice of social work to obtain an advanced clinical social worker license.
- *At this time the exam remains required for the clinical license

(ii) Whether to establish a temporary license for applicants for a Bachelor Social Worker license or a Master Social Worker license who, except for passing an examination required under Title 19, Subtitle 3 of the Health Occupations Article, meet the education and experience requirements for a license to practice Bachelor Social Work or Master Social Work under Title 19 of the Health Occupations Article.

Recommendation 1: Establish a temporary license for applicants for a Bachelor Social Worker license or a Master Social Worker license who, except for passing an examination, meet the education and experience requirements for a license to practice Bachelor Social Work or Master Social Work. *This could be considered as part of the grandfathering process.

(iii) How supervision may be provided to Bachelor Social Worker licensees and Master Social Worker licensees at no cost to the licensees.

Recommendation 1: Allow board approved licensed clinical supervisors to receive Category II CEU credit in exchange for providing supervision to LBSWs/LMSWs at a reduced cost. This recommendation would mitigate mutual financial burden for the supervisor and supervisee.

- The amount of CEUs granted could be considered upon approval of recommendation

Recommendation 2: Cover the cost of Category II training by providing such training through the Behavioral Health Administr.

Recommendation 3: Consider an incentive (e.g., tax credit), that could be provided to employers to offer access to board approved supervisors which would eliminate the additional out of cost expense for LBSWs and LMSWs.

- Should consider employer/agency paying for supervision

Recommendation 4: Allow for supervision to be completed virtually to ensure access to supervisors that may not be easily accessible locally.¹

(iv) If the Workgroup determines under item (i) of this item that the examinations developed by the Association of Social Work Boards should not be used or under item (ii) of this item that temporary licenses should be established, whether additional experience or education requirements are necessary.

Item i:

Bachelor Social Worker license

- Obtained a degree from a CSWE accredited undergraduate program of Social Work
- Satisfy the background check.

Master Social Worker license

- Obtained a degree from a CSWE accredited graduate program of Social Work
- Satisfy the background check.

¹ Hirsch, J., DeCarlo, M., Lewis, A., & Walker, C. (2024). Alternative Pathways to Social Work Licensure: A Critical Review and Social Equity Policy Analysis. *Journal of Evidence-Based Social Work*, 21(2), 177–198. <https://doi.org/10.1080/26408066.2023.2284919>

- Complete 2 years as a licensee with supervised experience of at least 3,000 hours with a minimum of 100 hours of periodic face-to-face supervision in the practice of social work to obtain a certified social worker license.

Item ii: Temporary [Provisional] License

- Timeframe?
- Licensure Requirements?
- What happens at Expiration of Temporary License?
- Grandfathering Process?
 - *All of the above need to be addressed in considering requirements for a provisional license

Recommendation 1: If a provisional/temporary license is established, the experience or education requirements may include:

Bachelor Social Worker Provisional License

- Obtained a degree from a CSWE accredited undergraduate program of Social Work.
- Satisfy the background check.
- Must obtain four hours per month of supervision.

Master Social Worker Provisional License

- Obtained a degree from a CSWE accredited graduate program of Social Work
- Satisfy the background check.
- Current regulations on supervision would still apply

Advanced Clinical Master Social Worker License (LCSW-C)

- Be a licensed MSW professional.
- Complete 2 years as a licensee with supervised experience of at least 3,000 hours with a minimum of 100 hours of periodic face-to-face supervision in the practice of social work to obtain an advanced clinical social worker license.

(v) a timeline for phasing in any determinations made under item (i), (ii), (iii), or (iv) of this item;

item (i): Jan 1, 2025

item (ii): Jan 1, 2026

item (iii): June 30, 2025

item (iv): Jan 1, 2025, and Jan 1, 2026

(vi) An outline and timeline for conducting the study required in subsection (h) of this section.

Tentative plans for the bias study to be submitted May 31, 2025, one year from submission of the Interim Report as per SB 871 (Chapter 228) (2023). At this time unable to develop outline and timeline as funds have not been identified for bias study.

At the time of this submission, further information regarding the Workgroup, including meeting agendas, presentations, and recordings, can be found on the developed Workgroup web page:

[Workgroup on Social Worker Requirements for Licensure](#)

Conclusion

SB 871 (2023) demonstrates the General Assembly's commitment to supporting Maryland's Social Worker workforce and achieving optimal mental and behavioral healthcare access across Maryland. The Workgroup members are appreciative of the opportunity to offer recommendations related to Social Worker requirements for licensure and how to implement potential alternatives to reduce barriers and bias for future Social Worker examinees.

Appendices

Item	Title
A	Subgroups Background Information and Meeting Information
B	2022 ASWB Exam Pass Rate Analysis
C	Briefing Information
D	Letters from Workgroup Members and Members of the Public
E	Letters from Government and Non-governmental Organizations

Appendix A: Subgroups Background and Meeting Information

Subgroup Name: Policy	
Subgroup Member	Workgroup Seat
(Chair) Stephanie C. Slowly, MSW, LCSW-C	Secretary of Health, or designee
Erin Penniston, MSW	Chair of the Maryland Commission on Health Equity, or designee
Katherine O. Breen	Director of the Governor's Office of the Deaf and Hard of Hearing, or designee
Phillicia Ross, LCSW-C	Representative of the NAACP Maryland State Conference, designated by the President of the NAACP Maryland State Conference
Karen Richards, LCSW-C	Executive Director of the State Board of Social Work Examiners, or designee
Karessa Proctor BSW, MSW	Representative of the Maryland Chapter of the National Association of Social Workers, designated by the Executive Director of the Maryland Chapter of the National Association of Social Workers
Subgroup Name: Recommendations on Testing	
(Chair) Dr. Christa Gilliam	Representative of the Baltimore Legacy Chapter of the Association of Black Social Workers, designated by the Baltimore Legacy Chapter of the Association of Black Social Workers
Robin Harvey, LCSW	Secretary of Human Services, or designee
Simone Bramble., LCSW-C	Individual who received a master's degree in social work within the immediately preceding 10 years
Dale J. Atkinson, Esq.	Representative of the Association of Social Work Boards, designated by the President of the Association of Social Work Boards
Temeka Bailey, LCSW-C, LICSW	Representatives from nongovernmental social service organizations that primarily work to support Central Maryland
Kristine Garlitz, LCSW-C	Representative from nongovernmental social service organizations that primarily work to support the Eastern Shore
Subgroup Name: Testing Barriers	
(Chair) Judith L. Mouny, Ed.D., MSW, LCSW-C, LICSW	Social worker who is deaf or hard of hearing and is familiar with the licensing process for deaf and hard of hearing social workers, designated by the Maryland Association of the Deaf
Cara E. C. Sanner	Representative of the Association of Social Work Boards, designated by the President of the Association of Social Work Boards
Adrienne Ekas, Ph. D. LCSW-C	Chair of State Board of Social Work Examiners or designee
Emanuel Wilkerson, BSW, MSW	Individual who received a master's degree in social work within the immediately preceding 10 years and who have been negatively impacted by the examination requirement for licensure under Title 19 of the Health Occupations Article
Subgroup Name: Universities/Schools/Programs of Social Work - Curriculum, CSWE Requirements etc.	
(Chair) Judy Postmus, Ph.D., ACSW	Dean of Social Work from accredited social work master's programs serving the State, one of which shall be from a historically Black college or university
Anna McPhatter, Ph.D., LCSW	Dean of Social Work from accredited social work master's programs serving the State, one of which shall be from a historically Black college or university
Linda Houser, Ph.D.	Dean of Social Work from accredited social work master's programs serving the State, one of which shall be from a historically Black college or university

Subgroups Meeting Dates and Topics Discussed

Workgroup on Social Worker Requirements for Licensure:		
Subgroups Meeting Dates and Topics Discussed		
Subgroup Name	Meeting Dates	Topics Discussed
Policy	February 2, 2024, February 16, 2024	<ol style="list-style-type: none"> 1) Subcommittee Requirements 2) Equitable access for licensure 3) Testing requirements 4) Testing accessibility and accommodations 5) State regulatory policies, legislation and regulations regarding licensure and exam requirements and waivers 6) Interim Draft Report Recommendations
Testing Barriers	January 26, 2024, February 6, 2024, February 20, 2024	<ol style="list-style-type: none"> 1) Subgroup Mandate and Goals 2) Cost of exam preparation, other fees, and financial concerns 3) Testing as a barrier to licensure: Testing Process, Locations and Environmental Barriers 4) Disability and other Accommodations 5) Concerns about the impact of institutional racism and other systemic inequities in the pipeline leading to testing. 6) Test structure and format 7) Interim Draft Report Recommendations
Recommendations on Testing	February 13, 2024, February 20, 2024, March 5, 2024 April 16, 2024	<ol style="list-style-type: none"> 1) Reviewed subcommittee mandate 2) Invited community stakeholders to provide input in writing. 3) Welcomed brief presentation from community stakeholder, Social Workers for Equity and Anti-Racism (SWEAR) 4) Subcommittee members brainstormed and discussed Interim Draft Report Recommendations to include in the interim report for further consideration and Next Steps for Subgroup 5) Further review of Interim Draft Report Recommendations
Universities	January 30, 2024	<ol style="list-style-type: none"> 1) Reviewed subcommittee mandate 2) Efficacy and fairness of the ASWB exams 3) Testing Accommodations 4) Interim Draft Report Recommendations

**Subgroups Interim Report DRAFT Recommendations- February 2024
Workgroup for Social Work Licensure Requirements**

Policy Subgroup (Chair: Ms. Stephanie Slowly)

It was very difficult for us to arrive to our overarching recommendations but felt the recommendations are really what we want to call our thought process around where we are right now and where we are hoping to get to in the next coming months. One of the things that we spoke about very consistently in the work was the need for us to have opportunities to speak with people with lived experience specifically in the community of those with English as their second language. We were hoping to have someone who is from or part of the deaf and hard of hearing community to come in and be there with us and we were unfortunately, just due to time constraints, not quite able to get there. However, we were able to come up with some recommendations.

SB 871 (Chapter 228) Interim Report Requirement (i) Whether to continue to use examinations developed by the Association of Social Work Boards as a requirement for a Bachelor Social Worker license or a Master Social Worker license.

Recommendation 1: Equitable access for licensure:

To support and mitigate the stress of the board and those seeking licensure, the subcommittee recommends a relaxation on the waiver for the time it takes to retest. For individuals who are within a 10% margin, they should be able to retest within 45 days without being assessed another testing fee. It should be noted that this may require an agreement between the State and ASWB to ensure that the individual does not require additional petitioning to the board for approval.

Recommendation 2:

Continue the conversation about testing requirements:

The subcommittee recommends continued exploration and research for at least six months to establish a consensus about whether testing requirements should be eliminated at the Bachelor's or master's level(s). The subcommittee would like to consider following neighboring states that are exploring the same pathway and potential legislation around the Social Work Licensure Compact and continue discussion within the subcommittee and larger Workgroup. We would like the opportunity to have that regional discussion before we establish a full policy recommendation in this area.

Recommendation 3: Improve testing accessibility:

The subcommittee recommends that policies be created regarding any testing that is implemented. All testing should have multiple languages, including American Sign Language, and other testing requirements should be considered low barriers to accommodate and provide accessibility and inclusion for individuals testing with disabilities. I think this recommendation also includes what you said Madam chair, around plain language to accommodate and providing accessibility and inclusion for all individuals with testing disabilities, and we feel that that should be a standardized policy that we're utilizing and that these requirements be included not only in the process of licensure, but also in the process of applying to be licensed in the state of Maryland.

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Recommendations on Testing Subgroup: (Chair: Dr. Christa Gilliam & Ms. Tameka Bailey)

Dr. Christa Gilliam indicated that the subgroup met twice and submitted the subgroup's draft recommendations. It looks like some of those recommendations were included in the DRAFT Interim Report which was sent to the Workgroup. Some of these recommendations bordered a bit on policy and would need review by the Policy subgroup. Primarily, we recommended eliminating the use of the BSW and LMSW exam for licensure contingent upon other criteria and recommendations. Ms. Bailey added that the subgroup discussed the importance of including the voice of the community in the recommendations, so we reached out to different groups to invite them to submit a one-page document with recommendation. Every member of the subgroup was invited to identify a person that we could reach out to, so we heard from several groups in the community as a group. We had an opportunity to look over those recommendations and have included as a part of the discussion that we had with each other to come up with recommendations.

SB 871 (Chapter 228) Interim Report Requirement (i) Whether to continue to use examinations developed by the Association of Social Work Boards as a requirement for a Bachelor Social Worker license or a Master Social Worker license.

Recommendation 1: Eliminate the use of the ASWB exam as a requirement for licensure as an LBSW and LMSW. Consider instead, an alternative (inclusive) pathway to licensure that involves several reliable components such as:

1. Increased number of 1:1 supervision hours provided by a board approved, licensed clinical social worker (see recommendation in later section on mitigating financial burden).
2. Graduating from a CSWE accredited Social Work program.
3. Completing a specified number of supervised practice hours;
4. Satisfying the background check; and
5. Ongoing completion of highly regulated CEUs (also need to consider additional financial burden resulting from lower earning potential while in provisional status)

Recommendation 2: If the LBSW and LMSW exam is continued, consider the following recommendations:

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1. 3-year moratorium on all exams to allow adequate time for additional inquiry to explore and eliminate disparities in the current exam. This should include getting data independent of ASWB to ensure thorough review of the exam.
2. Explore alternate exam vendors that will allow selection of broader options for test takers.
3. Approved test vendor(s) should make all LBSW/LMSW examination prep materials free.
4. There should be a single fee for the exam (no fee to retest).
5. Approved test vendors should provide an annual report of pass rates based on intersecting identities including race, age, disability, gender etc.
6. Truncate the 90-day limit between testing attempts.
7. Provide specific feedback on incorrect answers and allow test takers to only retake the section of the exam that they did not pass.
8. After one failed attempt, allow the option of selecting an alternative pathway to licensure described above.
9. Adopt point waiver system that allows test takers an established range to receive a pass outcome. The point waiver should be retroactive for review and consideration of test takers who met the established criteria within the past 7 years.
10. Considerations for Deaf and Hard of Hearing colleagues should include:
 - a. Ensure that interpreters are well-versed in social work terminology, testing environments in addition to being bilingual ASL- English translations.
 - b. Higher point waivers to account for potential interpretation challenges
11. Streamlined process to support testing accommodations for disabled test takers.
12. Offer exam version in multiple languages.
13. Following elimination of racially biased content, exam questions should include a maximum of 3 multiple choice options.
14. Establish an ongoing task force to maintain accountability by monitoring variables contributing to identified disparities in pass rates.
15. There should be clear communication regarding conditions and results of the required background check PRIOR to test takers sitting for the exam.

Recommendation 3: As an alternative to the current test, provide a jurisprudence exam based solely on objective laws and regulations in the state of Maryland.

SB 871 (Chapter 228) Interim Report Requirement: ii) Whether to establish a temporary license for applicants for a Bachelor Social Worker license or a Master Social Worker license who, except for passing an examination required under Title

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19, Subtitle 3 of the Health Occupations Article, meet the education and experience requirements for a license to practice Bachelor Social Work or Master Social Work under Title 19 of the Health Occupations Article.

Recommendation 1:

1. A provisional/temporary license would counter chronic workforce shortages and lack of representation in various social work settings. It would also increase earning potential and opportunity for underrepresented groups in social work settings. As noted above, an alternative pathway would include:
 - a. Increased supervision hours provided by a board approved, licensed clinical social worker (see recommendation in later section on mitigating financial burden). This would be in addition to meeting the requirement of graduating from a CSWE accredited university.
 - b. Completing a specified number of supervised practice hours.
 - c. Satisfying the background check.
 - d. Provisional licensure for LBSW and LMSW (without examination) could also include ongoing completion of highly regulated CEUs (also need to consider additional financial burden resulting from lower earning potential).

SB 871 (Chapter 228) Interim Report Requirement: iii) How supervision may be provided to Bachelor Social Worker licensees and Master Social Worker licensees at no cost to the licensees.

Recommendation 1: Allow board approved licensed clinical supervisors to receive Category II CEU credit in exchange for providing supervision to LBSWs/LMSWs at no cost. This recommendation would mitigate mutual financial burden for the supervisor and supervisee.

Recommendation 2: Consider an incentive that could be provided to employers who offer access to board approved supervisors which would eliminate the additional out of cost expense for test takers.

Testing Barriers Subgroup (Chair: Dr. Judy Mounty)

Dr. Mounty indicated that the subgroup has four members. The full group met three times. Mr. Wilkerson was not able to attend the first two meetings and because of his

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work schedule but Dr. Mounty met with him separately to gain his critical perspective as an individual who was most recently harmed by the process of obtaining licensure, he joined for the third meeting with the other group members. Testing Barriers Include:

Cost of preparation, exam, other fees, and financial concerns:

Mr. Wilkerson feels that the cost is a problem overall, but it is even more discouraging for those who need to retake the test. People with financial constraints who fail cannot see what time slots are available to retake the test, say in a few months, without first paying and many cannot afford that. Test costs should be waived for test-takers who retest. Examples are below:

Oregon has implemented Oregon HB2949 of 2021 -

<https://olis.oregonlegislature.gov/liz/2021r1/Measures/Overview/HB2949> This created the Behavioral Health Incentive Subaccount in the Health Care Provider Incentive Fund to increase recruitment and retention of providers in the behavioral health care workforce from historically marginalized groups. This fund is being used to support licensure candidates by paying for examination fees for up to 700 individuals in a two to three-year period. Specific priority is on incentivizing providers who are culturally specific, culturally responsive, linguistically specific, and/or rural providers.

In January 2024, PSI began administering the ASWB licensing exam program.

ASWB and PSI will pursue initiatives designed to support candidates' paths to licensure, including the development of a scholarship fund for repeat test-takers. The two organizations have each pledged to contribute to a fund for future outreach to and support for test-takers, particularly those from historically marginalized communities.

<https://www.aswb.org/aswb-selects-psi-as-new-testing-partner/>

Testing Locations and Process

1. Great distance in traffic
2. Rigorous Identification Process
3. Inconsistent security procedures
4. ASWB is working with its current vendor to offer remote proctoring, where individuals can take the exam in their own homes, in a manner that ensures exam security and fidelity.
5. The time limit. The four hours are too short for the exam. Most of the exam items are scenario-based questions. These questions can vary from 2 to 6 sentences. This is mentally draining for 170 questions. The exam's time needs to be

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extended 30 minutes to 1 hour for test-takers to have scheduled breaks to stretch, rest their eyes, and go to the bathroom.

Disability and other Accommodations:

1. If someone has a permanent disability, they shouldn't have to go through the process to determine special arrangements each time. Concerns re: having to redo the application process for a permanent disability.
2. People who are taking nonstandard administrations must call to schedule their tests which is a cumbersome process for deaf people who cannot use the phone directly.
3. The current process for retaining interpreters results in inconsistent quality/qualifications. Interpreters for testing situations need specialized skills and experience and must be familiar with the content or will not render semantically congruent translations.
4. The group agrees that we would like an opportunity for ASWB to respond to these suggestions and better understand the process for evaluating non-standard testing arrangement requests and the reasons for these policies.

Concerns about impact of institutional racism and other systemic inequities in the pipeline leading to testing, the testing environment:

1. We discussed this topic during our 2.6.24 meeting. ASWB published the 2022 ASWB Exam Pass Rate Analysis as part of the association's commitment to participating in data driven conversations around diversity, equity, and inclusion. The report identified differences in pass rates amongst different demographic groups. However, these differences vary by school program, and some school programs demonstrate very little difference in pass rates across various demographic groups. This underscores that there is an array of factors that contribute to the pass rate differences across key demographics including race. ASWB is working with independent researcher Dr. Joy Kim and her team at Rutgers University who are performing further policy analysis to understand specific variables that influence disparities in exam pass rates.
2. Ms. Sanner shared that ASWB started Community Conversations where they invited social workers to share their experiences with social work licensing and the licensing exams. [Community conversations - Association of Social Work Boards \(aswb.org\)](https://www.aswb.org/community-conversations). Dr. Mouny is not aware of Gallaudet and deaf and hard of hearing persons with social work degrees being included in this research. They need to be. This would require a different approach to identifying research participants since it is a "low incidence" population.

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Test structure and format:

1. Dr. Mounty has concerns about item structure and use of English, including insufficient context, unclear referents, multiple embedded clauses, distractors that are based on grammaticality. Simple declarative sentences and increased contextual redundancy should be considered. Dr. Mounty is concerned that the tests are not able to accurately evaluate competence for all populations. She thinks we need more information about the experiences of candidates and a job analysis process that involves going into diverse communities. Consider an alternative, uniform assessment for people who are not passing repeatedly.
2. Dr. Mounty suggests that principles of universal design be considered in the test development process and perhaps for licensing bodies to consider multiple measures.

Recommendations

At this time, the group does not have consensus on recommendations related the testing requirement for all levels of licensure. We discussed the various supports ASWB offers to test takers and educators and generally identified that there may be a need to educate more broadly on the resources currently available. Dr. Mounty discussed the importance of supervisors having access to the practice exam to help prepare supervisees. ASWB has taken a concrete measure of implementing a program called Fifth Theory, which is a resource to help those that do not pass the test. Applicants that do not pass will be sent information on this within a week of failing an exam. [Test-taking support - Association of Social Work Boards \(aswb.org\)](https://www.aswb.org). ASWB should make it clear in its study materials about the format of the exam questions and the types of questions that are asked. Discussion re. inconsistency in degree programs; CSWE needs to take a closer look at what is happening in programs e.g., Fordham MSW program. Recommendations for research/further study or for further discussion with the full workgroup:

1. Dr. Mounty asks ASWB to consider working with Gallaudet University.
2. Dr. Mounty is willing to work with ASWB to do a small-scale study with individuals having a hard time passing the exam. She thinks we need to go to the populations that are being disproportionately affected and do qualitative investigations using sample/practice tests, or perhaps allowing participants to take the actual test, and to make notes about their experiences with specific items, item types, etc. which would then be collected and discussed at the interview.
3. Ms. Sanner asks the workgroup to monitor the current research underway at ASWB and by independent researchers for specific implications for Maryland.

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Universities (Chair: Dr. Judy Postmus)

Dr. Postmus indicated that the subgroup consisted of University Deans and directors from around the state of Maryland. We also had several others attending the meeting as there was an open forum. We met one time. We have not finalized our recommendations, but we did draft notes of what we talked about and forwarded those on to your team. So, the biggest recommendation that we talked about was obviously we talked about the exam, and we reckon we identified the possibility of discontinuing the exam entirely. Our draft recommendations are as follows:

To Senate and Subcommittee:

Recommendation 1: To Senate and Subcommittee: To facilitate transparency and informed decision-making regarding social work licensure policies consider the following recommendations: Provide resources to create a database with the following:

1. Summary of each U.S State and Canadian Providence processes for social work licensure
2. Pending legislation or efforts to changes policies in states and Canada.
3. Implications of Interstate Compact and testing requirements

Rationale: This database will enable the Workgroup, jurisdiction authorities, and aspiring social workers to make data-driven decisions regarding licensure policies. Centralizing this information in one location will improve accessibility and allow for easier cross-jurisdictional comparisons.

General Recommendation for ASWB Exams:

Recommendation 1: To ensure the ongoing efficacy and fairness of the ASWB exams, consider the following recommendation: A third unbiased set of test experts should review the exams and the procedures for creating them and provide a detailed report regarding its efficacy, reliability, and validity, including predictive validity. ASWB should pay for this review as a good faith gesture.

Rationale: Periodic independent review by unbiased experts will help ensure the exams accurately and equitably assess competence for licensure. ASWB funding the review demonstrates commitment to an impartial process, while having the panel report directly to independent oversight maintains the integrity of findings.

SB 871 (Chapter 228) Interim Report Requirement (i) Whether to continue to use examinations developed by the Association of Social Work Boards as a requirement for a Bachelor Social Worker license or a Master Social Worker license.

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Recommendation 2: To address concerns about the equity of current ASWB Bachelor's and master's exams, consider the following recommendations:

1. Discontinue the ASWB exam requirement entirely.
2. If not #2, allow those who want to take the ASWB exam to do so and create an alternative pathway for others to be licensed.
 - a. Additional supervision or CEUs, although we need to be cautious to not create additional barriers.

Rationale: There are outstanding questions about the fairness of these exams that warrant reconsidering their mandated use. Pausing their required status could allow time to address concerns. Alternate pathways would provide options for those who cannot pass the exams despite having the required knowledge and skills.

Recommendation 3: To ensure equitable access to Clinical licensure (LCSW-C Exams), consider the following recommendations:

Consider Illinois as a model.

1. Allow those who want to take the ASWB exam to do so.
2. AND create an alternate pathway for those who do not wish to take the exam to become licensed. Illinois did this by extending the required hours by DOUBLE, which means that folks who don't take the exam have to stay at the LM level for twice as long which has major financial implications.

Rationale: The Illinois approach demonstrates a potential compromise that maintains testing access while creating alternatives that do not unduly disadvantage those unable to pass the ASWB exam.

Recommendation for Testing Accommodations (“Non-standard testing arrangements”)

Recommendation 4: To streamline the accommodations request process and reduce undue burden on applicants, consider the following recommendations:

1. Allow online submission for requests.
2. Discontinue the requirement of a personal statement: Creates undue burden; is intrusive and is not relevant to implementing accommodations. It is duplicative of other required information.

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3. Require EITHER a learning disability evaluation report OR a practitioner form:
 - a. Requiring both is redundant and creates undue burden.
 - b. Gaining access to learning evaluation reports can be very difficult since they were often performed in K-12.

Rationale: Adjusting these aspects of the accommodations request process will make it substantially easier and less invasive for disabled applicants to receive the accommodations they require to demonstrate their abilities on the exams.

Appendix B: 2022 ASWB Exam Pass Rate Analysis

Appendix B: 2022 ASWB Exam Pass Rate Analysis

Social Work Exam Passage Rates Maryland Specific Data, 2011-2021¹ Maryland – Bachelor’s Exam Passage Rates, 2011-2021

Number of test-takers and **first-time** pass rates by demographic group 2011 – 2021

State/Province	# test-takers (overall)	Pass rate (overall)
MD	498	61.2%

Demographic	Group	# test-takers	Pass rate
Race/Ethnicity	Asian	7	
	Black	189	39.7%
	Hispanic/Latino	40	67.5%
	Multiracial	12	50.0%
	Native American/Indigenous peoples	0	
	White	235	77.9%
Gender	Men	61	63.9%
	Women	437	60.9%
Age	18 - 29	294	65.3%
	30 - 39	106	54.7%
	40 - 49	59	54.2%
	50 and older	39	59.0%
Language	English	464	62.5%
	Non-English	34	44.1%

<https://www.aswb.org/exam/contributing-to-the-conversation/aswb-exam-pass-rates-by-state-province/>

Maryland – Master’s Exam Passage Rates, 2011-2021

Number of test-takers and first-time pass rates by demographic group 2011 – 2021			
State/Province	# test-takers (overall)	Pass rate (overall)	
MD	8,003	78.5%	
Demographic	Group	# test-takers	Pass rate
Race/Ethnicity	Asian	218	82.1%
	Black	2,708	55.5%
	Hispanic/Latino	458	79.3%
	Multiracial	207	85.0%
	Native American/Indigenous peoples	14	78.6%
	White	4,198	92.8%
Gender	Men	907	74.8%
	Women	7,092	79.0%
Age	18 - 29	4,495	83.0%
	30 - 39	2,094	75.8%
	40 - 49	919	69.0%
	50 and older	495	66.1%
Language	English	7,564	79.4%
	Non-English	439	62.4%

Maryland - Clinical Exam Passage Rates, 2011-2021

Number of test-takers and first-time pass rates by demographic group 2011 – 2021			
State/Province	# test-takers (overall)	Pass rate (overall)	
MD	4,540	78.7%	
Demographic	Group	# test-takers	Pass rate
Race/Ethnicity	Asian	104	84.6%
	Black	1,129	54.1%
	Hispanic/Latino	195	65.6%
	Multiracial	99	87.9%
	Native American/Indigenous peoples	7	
	White	2,905	88.6%
Gender	Men	503	75.5%
	Women	4,035	79.1%
Age	18 - 29	1,405	86.8%
	30 - 39	1,982	79.8%
	40 - 49	687	67.7%
	50 and older	466	65.9%
Language	English	4,347	79.4%
	Non-English	193	62.2%

Social Work Exam Passage Rates, 2018 – 2021, Maryland & National Data by Race & Ethnicity
Maryland - Bachelor's Exam - Race/Ethnicity, 2018-2021

Number of test-takers and **first-time** pass rates by demographic group **2018 – 2021**

State/Province	# test-takers (overall)	Pass rate (overall)
MD	199	54.3%

Demographic	Group	# test-takers	Pass rate
Race/Ethnicity	Asian	3	
	Black	69	29.0%
	Hispanic/Latino	28	60.7%
	Multiracial	5	
	Native American/Indigenous peoples	0	
	White	88	70.5%

National - Bachelor's Exam - Race/Ethnicity, 2018-2021

Race/Ethnicity	2018		2019		2020		2021	
	n	Pass rate	n	Pass rate	n	Pass rate	n	Pass rate
Asian	73	60.3%	85	48.2%	85	57.6%	97	71.1%
Black	515	37.5%	475	34.9%	319	33.2%	446	31.6%
Hispanic/Latino	254	52.8%	274	49.6%	175	54.9%	293	54.6%
Multiracial	77	77.9%	69	73.9%	54	77.8%	100	71.0%
Native American/ Indigenous peoples	38	71.1%	34	55.9%	33	57.6%	40	75.0%
White	2,659	76.7%	2,573	75.7%	1,944	75.8%	2,406	77.0%

<https://www.aswb.org/wp-content/uploads/2022/07/2022-ASWB-Exam-Pass-Rate-Analysis.pdf> pages 76-84

The following data compares national passage rates by ethnicity and race from 2018-2021. The national data is limited to 2018-2021 due to the implementation of a new exam concept in 2018.

Maryland - Master's Exam - Race/Ethnicity, 2018-2021

Number of test-takers and first-time pass rates by demographic group 2018 – 2021			
State/Province	# test-takers (overall)	Pass rate (overall)	
MD	3,408	74.6%	
Demographic	Group	# test-takers	Pass rate
Race/Ethnicity	Asian	89	85.4%
	Black	1,213	51.4%
	Hispanic/Latino	232	75.0%
	Multiracial	95	83.2%
	Native American/Indigenous peoples	4	
	White	1,676	90.0%

National - Master's Exam - Race/Ethnicity, 2018-2021

Race/Ethnicity	2018		2019		2020		2021	
	n	Pass rate	n	Pass rate	n	Pass rate	n	Pass rate
Asian	558	68.8%	575	69.6%	535	72.3%	754	71.2%
Black	3,010	45.0%	3,355	44.5%	3,254	45.2%	4,225	43.9%
Hispanic/Latino	1,755	66.4%	2,031	62.1%	1,878	65.3%	2,752	62.0%
Multiracial	400	82.3%	427	79.2%	430	83.7%	585	77.9%
Native American/ Indigenous peoples	96	66.7%	107	59.8%	114	67.5%	136	65.4%
White	10,474	86.2%	11,160	85.1%	9,984	87.1%	12,423	85.3%

Maryland - Clinical Exam - Race/Ethnicity, 2018-2021

Number of test-takers and **first-time** pass rates by demographic group 2018 – 2021

State/Province	# test-takers (overall)	Pass rate (overall)
MD	1,891	77.3%

Demographic	Group	# test-takers	Pass rate
Race/Ethnicity	Asian	37	81.1%
	Black	513	53.4%
	Hispanic/Latino	91	65.9%
	Multiracial	52	86.5%
	Native American/Indigenous peoples	2	
	White	1,162	88.4%

National - Clinical Exam - Race/Ethnicity, 2018-2021

Race/Ethnicity	2018		2019		2020		2021	
	n	Pass rate	n	Pass rate	n	Pass rate	n	Pass rate
Asian	574	67.2%	561	68.1%	567	72.1%	768	74.9%
Black	2,187	39.2%	2,293	44.0%	2,634	44.6%	2,932	46.2%
Hispanic/Latino	1,838	62.0%	2,071	62.5%	1,873	67.0%	2,726	65.8%
Multiracial	409	77.8%	436	78.4%	430	80.2%	576	80.7%
Native American/ Indigenous peoples	89	65.2%	98	66.3%	97	63.9%	115	59.1%
White	10,437	82.7%	11,205	82.8%	10,684	83.7%	12,977	85.0%

Appendix C: Briefing Information

Appendix C: Briefing Information

Washington Post

Want to fix the social worker shortage? Start with the licensing exam.

Advocates for change say low pass rates for people of color point to bias in standardized tests. D.C. is weighing changes.

Perspective by [Petula Dvorak](#)

Columnist

March 18, 2024 at 6:03 p.m. EDT

Kristi Love worked thousands of supervised hours to prepare. **She earned a master's degree in social work from Howard University. She has been uplifting people living in the nation's capital for over a decade.**

"But I can't call myself a licensed social worker," she said. And she is not alone in a field desperate for people like her. Even as rising mental illness, housing instability and other challenges send hiring managers scrambling for licensed social workers, one thing often gets in **the way: an antiquated licensing exam. She's tried three times to pass it, and always barely misses.** The multiple-choice answers don't reflect the real-world scenarios social workers face, Love said. Instead, the test focuses on the theoretical ideals of a profession that has always been both noble and flawed, long defined by White intellectuals who try to do good as defined by their worldview.

"As a Black person, coming from Black people and Black professors, that test wants me to think like a White social worker in Idaho," said Love, who works in the field, but without the pay and opportunities a license would offer her. She speaks often about the disconnect as the president of the [Association of Black Social Workers of Metropolitan Washington D.C.](#) **A rising generation of practitioners is pressing the field's gatekeepers — who extol the virtues of evidence-based service — to examine the facts:**

Between 2018 and 2021, 76 percent of White test-takers passed on the first try on the **bachelor's level exam. Those numbers drop to 52.8 percent for Hispanic applicants, 63.6 percent for Native Americans, 59.6 percent for Asians and 33 percent for Black test-takers,** according to an [analysis](#) by the Association of Social Work Boards (ASWB), which designs and administers the licensing exams.

Also troubling is a 66 percent pass rate for folks over 50, an obstacle in what is a popular field for career-switchers or people returning to the workforce after their kids get older.

These are all applicants who, like Love, have college degrees in social work, did extensive **clinical training and had intense internships. And we're about to need more of them.**

Job openings for social workers are expected to be triple that for other occupations in the coming years, according to the U.S. Bureau of Labor Statistics.

Advocates of reconsidering licensure — which include the National Association of Social Workers — say the test is not written for all of the test-takers, the communities they trained in and the communities they want to serve.

"It's very antiquated," said Valeria Carter, a social worker and director of clinical programs at the Hillcrest Children and Family Center, who failed her first try at the test decades ago and now sees scores of capable college graduates who have logged thousands of clinical hours stumble.

They might answer a question about grief rooted in that front-line experience, she said, instead of reaching for a stages-of-grief framework pioneered in 1969 by Elisabeth Kübler-Ross. **The nation's reckoning with standardized testing has extended to licensure exams across the nation** and in different fields. Some states are reimagining bar exams for lawyers. Like universities charting their own course amid discourse on cultural biases in the SAT, each state sets its own rules on social workers. Illinois eliminated exams as a requirement for licensure, and in two years the number of social workers there doubled, according to the state's chapter of the National Association of Social Workers.

The D.C. Council is considering something similar. "This is a common-sense step that the District can take to make a real, immediate impact on our shortage of social workers," council member Robert C. White Jr. (D-At Large) said in his introduction of the Social Work License Modernization Amendment Act last year.

D.C. Council member Robert C. White Jr. (D-At Large) speaks to a group gathered to conduct surveys of homeless people as part of the annual Point-in-Time census last January. (Bonnie Jo Mount/The Washington Post)

The shortage has been profoundly **felt in the nation's capital on several fronts** — a dynamic D.C. officials have acknowledged amid scrutiny of the District's housing programs.

It was clear when officials began clearing encampments and struggled to get people who had **been living in tents into housing simply because there weren't enough licensed case workers to handle the load.** "In the past four years, we've had 90 unlicensed social workers apply," said Will Doyle, a social worker with Pathways to Housing DC. "And we couldn't hire any of them." This is about more than numbers. Clients need access to social workers who understand them.

This is acute in D.C.'s deaf community, one of the largest in the nation thanks to the presence of the federal government and Gallaudet University. "Twenty years later and I am not a

licensed clinical social worker **yet," said Concetta Pucci**, Director of Undergraduate Field Education in the social work department at Gallaudet. **Pucci graduated with a master's degree** in social work from New York University in 2002 and failed the licensure test five times. She now has a PhD. **Dr. Pucci passed the masters level exam in 2015 and just passed the clinical exam in DC on the 2nd attempt on 4/15/24.**

"We have 20,000 deaf people living in the DMV area, and we have 10 licensed clinical social work workers who identify as deaf or are fluent in American Sign Language," Pucci said. And five of them are faculty members at Gallaudet.

There is no data on pass rates for hard-of-hearing applicants, but Judy Mouny, a Gallaudet University graduate who now has a private practice, has studied, written and testified about the difficulties of the exam for years.

"This issue has deprived Maryland of more than 1,200 committed and competent mental health providers, including people of color, older candidates, nonnative speakers of English, and deaf and hard of hearing individuals," Mouny said in testimony last year in Maryland, which is considering legislation similar to the District's.

Most who challenge the exam don't want to do away with licensing altogether. There are arguments for provisional licensing or calls for the association to gather a more diverse group of social workers to rewrite the test to reflect real-life scenarios, rather than classroom theory.

The testing folks admit there's a problem.

"In this new analysis, we observe that pass rates for some demographic groups are lower than for others, highlighting the need to identify potential steps that ASWB can take to address these differences while adhering to the public protection mandate that guides its mission," board president Roxroy A. Reid and chief executive Stacey Hardy-Chandler wrote in the introduction to their data study.

Some in the profession worry that an already marginalized and underpaid profession will be further delegitimized if licensing standards are softened or eliminated.

But let's be honest. Social work is about dynamic, unpredictable and utterly unique things — humans.

Few people understand that, or them, better than Love.

NASW-IL Staff-Aug 4, 2023

NASW-IL Advocacy At Work: Gov. Signs HB 2365 Providing Alternative to ASWB Exam

Governor Pritzker Signs Landmark Bill to Strengthen Our Mental Health Workforce by Forging an Equitable Path for Social Work Licensure

NASW-Illinois Chapter membership helps us to push for legislation that supports a more equitable profession and a better life for your clients. As the largest membership association in Illinois advocating on behalf of social workers, consider adding your voice to our efforts and [join/renew your NASW membership](#) today.

Governor J.B. Pritzker has taken a momentous step towards fostering equity and inclusivity in the field of social work by signing [House Bill 2365](#), a groundbreaking bill that establishes an alternative to the ASWB test for clinical licensure. This landmark legislation marks a significant milestone in the quest to create a more equitable path for aspiring social workers, ensuring that opportunities are accessible to a diverse pool of talent across Illinois.

HB2365 builds on the success of previous legislation that removed the Association of Social Work Boards (ASWB) exam for non-independent clinical licensure, by creating a first-in-the-nation alternative path for independent clinical social workers to complete the licensure process. Under the new law, **social workers will need to acquire a master's degree in social work, obtain 3,000 hours of intense clinical supervision by a licensed clinical social worker, and have attempted to pass the ASWB exam at least once in the past 5 years.** Social workers will be given the opportunity to either continue to retake the exam or pursue an alternative path that would add on an additional 3,000 hours of supervised work experience before applying to the state for independent licensure.

The bill's chief senate sponsor and licensed school social worker, Senator Karina Villa said: **"Social workers do so much for our residents. They advocate for our most vulnerable** populations, helping to foster a sense of inclusivity and cohesion in our communities. With social worker shortages hitting across the US, it is important to consider what is in the best interest of the people who need these types of services the most. By supporting people who are dedicated to empowering individuals and families, we can improve the quality of life for thousands of Illinoisans."

The ASWB exam has long been a standard requirement for individuals seeking to enter the social work profession. However, this assessment has, at times, posed a barrier for many aspiring social workers who possess exceptional skills and abilities but face disparities in standardized testing environments. This new law reflects the governor's continued commitment to dismantling systemic barriers and opening doors to a more diverse and talented social work workforce.

The bill's chief house sponsor, Representative Lindsey LaPointe, MSW, added: " For all of us working to increase access to mental health support in Illinois and nationwide, it's crystal clear that our shortage of clinicians is a central issue. Once law, HB2365 will rapidly increase the social work workforce by removing the barrier of the LCSW exam—an exam shown to be racially and age biased. I'm proud that Illinois is leading the way to broaden and build up the mental health workforce with the ultimate goal of **access.**"

The bill's implementation will incorporate an apprentice approach to evaluating the competence and capabilities of aspiring social workers, offering them a fair and unbiased opportunity to demonstrate their qualifications. This alternative assessment will take into account a broader range of factors such as practical experience, interpersonal skills, and the ability to navigate real-life scenarios that social workers often encounter on the job.

In the spirit of collaboration, bill sponsors Sen. Villa and Rep. LaPointe worked closely with social work advocacy groups, educators, and providers to develop a framework that ensures the highest standards of professional competency while fostering a more inclusive approach to social work licensure.

National Association of Social Workers, Illinois Chapter (NASW-IL) Board President Latesha Newson, MSW, LCSW, stated: "**The National Association of Social Workers, Illinois Chapter**, couldn't be prouder to have lent our support and resources to see this become a reality. This is a measure of justice; transformative justice for those who have been locked out of a profession that they are fully qualified and prepared to be in. As social workers, we are charged to remove barriers and challenge systems that perpetuate inequities to change, and we have done just that! We look forward to welcoming new LCSWs as colleagues and the impact that they will **make in the lives of the people they serve.**"

As the new alternative assessment takes effect on January 1, 2024, it is anticipated that more social workers with disabilities, older social workers, and those from underrepresented backgrounds and marginalized communities will be empowered to pursue their passion for creating positive change and providing critical support to those in need. At a time when Illinois is facing a significant mental health workforce shortage, the state cannot afford to leave fully qualified professionals on the sidelines due to biased testing.

Cassandra Walker, LCSW, CCTP, an organizer for the [#StopASWB](#) coalition and owner of Intersections Center for Complex Healing PLLC reflected: "**The reckoning around ASWB has** been coming for decades, and I am happy to see this first step signed into law here in Illinois. We fought long and hard for those social workers who have been unjustly barred or pushed out of clinical work in their communities. Despite the abuse and attacks used against us, we will keep working to make social work live up to the promises it makes on paper. I hope that other professions and states follow our example and push this work further as it is clear that these kinds of tests are not making us safer, don't measure what they claim, and generally weaken **our ability to properly staff organizations in professions which already have massive shortages.**"

Governor Pritzker's decisive action in signing this bill underscores the importance of creating a diverse and equitable workforce in the field of social work and will serve as a nation-leading model for other states to follow.

Important Note: The law's effective date is not until January 1, 2024, and as such, the application and verification process for the alternative path is not yet available. The chapter will post further updates closer to the end of the year when the department has more information. You can learn more about what is in the law here: [Learn More About Social Work Exam Alternative Bill HB2365 SA1 \(naswil.org\)](https://www.naswil.org/post/nasw-il-advocacy-at-work-gov-signs-hb-2365-providing-alternative-to-aswb-exam)

<https://www.naswil.org/post/nasw-il-advocacy-at-work-gov-signs-hb-2365-providing-alternative-to-aswb-exam>

NASW-IL Staff-Feb 5

Illinois Breaks Barriers in Mental Health Workforce, Achieving Remarkable Growth in Licensed Social Workers (LSWs)

CHICAGO, IL—Thanks in large part to a bill signed into law by Governor JB Pritzker, the number of licensed non-independent social workers has increased by 100% since Dec 1, 2021 in Illinois, exceeding the 10,000 mark for the first time. In light of severe mental health workforce shortages in the state as well as issues of diversity within the profession, this achievement is a first step to addressing an alarming shortage of mental health professionals in Illinois.

Since passage of a bill that removed a known biased exam—the Association of Social Work Boards (ASWB) MSW exam—as a requirement for licensed non-independent social workers (i.e., licensed social workers or LSWs) in Illinois, numbers have risen from an initial 5,037 LSWs in December 2021, to 7,845 just six months after the new law's implementation. These numbers continued to increase to a new milestone of 10,086 new LSWs in Illinois on December 1, 2023. Most notably, 12% of these licensed LSWs come from outside the state, drawn by opportunities presented by this legislative change. These professionals are now either serving Illinois clients via telehealth or have relocated to the state, contributing significantly to the local workforce.

This legislative achievement marks a pivotal moment in ongoing efforts by Illinois to address workforce challenges and address inequities in the mental health sector to ensure that all Illinois residents have access to high-quality social work services. Illinois has made a clear statement about its commitment to removing barriers for skilled and dedicated individuals entering the profession by eliminating a biased testing requirement from licensure in the state.

NASW-Illinois Chapter Executive Director Joel L. Rubin, MSW, LSW, ACSW, CAE, stated, "This is a monumental success for social work in Illinois. It underscores our belief in the importance of accessible mental health services and the need to diversify and strengthen our professional community. We commend Governor Pritzker and the General Assembly for their commitment and dedication to improving the lives of Illinois residents through mental health workforce development that grows and diversifies the talent pool in Illinois."

In the previous spring 2023 session, the state went even further by passing a first-in-the-nation law that creates an alternative to the ASWB clinical exam for licensed clinical social workers (LCSWs) which went into effect on January 1, 2024. While data on its impact is not yet available, we are anticipating significant gains for that license as well.

While the NASW-Illinois Chapter celebrates this legislative success as a major step forward in ensuring a robust and responsive social work profession, we recognize that more work remains to address the significant workforce shortages in mental health in Illinois. We are eager to work with the state to address other barriers by implementing paid field placements and child care assistance for students, expanding loan forgiveness for contract workers in social work,

providing low-cost clinical supervision opportunities, expanding social work programs to address the growing need for specialization in crisis interventions, creating new programs to recruit high school students to the field, and a "Grow Your Own" program to not only increase the number of social workers in Illinois, but TO diversify the workforce even further as we build.

The National Association of Social Workers (NASW) is the largest membership organization of professional social workers in the world. The NASW-Illinois Chapter is one of the association's largest chapters and advocates for over 20,000 social workers in Illinois alone. NASW strives to advance social work careers, grow social work businesses, and protect the profession while seeking to also enhance the well-being of individuals, families, and communities through advocacy.

<https://www.naswil.org/post/illinois-breaks-barriers-in-mental-health-workforce-achieving-remarkable-growth-in-licensed-social>

Appendix D: Letters from Workgroup Members and Members of the Public

Letter to Workgroup from Chair Abney

Subject: Workgroup on Social Work Licensure Requirements Next Steps and Plan for 3/26/24 Workgroup Meeting

Members of the MD Workgroup on Social Work Licensure,

I want to Thank You and let you know I appreciate your service as a member of the Workgroup, especially in giving of your time to complete our appointed tasks. After our last meeting on February 27, 2024, I held a meeting with the Chairpersons of each Subgroup to discuss the work of the Subgroups to date, and next steps as we move forward. Those next steps included identifying potentialities with the elimination of the ASWB exam as a requirement for licensure, and implementation of new processes, including increasing staffing to handle an increase in applicants, concerns with the grandfathering process, and enacting new regulations related to licensure. There was agreement that the implementation research and analysis will remain ongoing beyond the Interim report submission. This work may include:

- Evaluating what impact this will have on the BSWE, overall requirements and the grandfathering process as well as potential administrative burden.
- Inviting boards/NASW chapters from Illinois and Virginia to brief the Workgroup on the Illinois implementation process and best practices when they eliminated the BSW and LMSW exams, and **Virginia on the licensure process and requirements for BSWs and LMSWs in Virginia-(correction-042924)**.

I have asked for a one month's extension on the submission of the Interim Report, which is currently due on March 31, 2024, and am still awaiting a decision. I anticipate the request will be granted, but still want us to move forward in finalizing the report, nonetheless.

During the March 26th meeting, I would like us to take a final binding vote on the elimination of the ASWB exam as a requirement for licensure at the BSW and MSW levels. A straw vote was held at the February meeting with the consensus agreeing to the elimination of the ASWB exam as a requirement for licensure at the LBSW and LMSW levels. We will also discuss refocusing of the work of the Subgroups in relation to the vote. In addition, we will have a briefing from Laura Groshong, LICSW, Director of Policy and Practice of the CSWA on the Social Work Compact.

Please feel free to contact me for anything.

All the Best,

Karla J. Abney, MSW, MSN, LMSW
Chair

Subject: Workgroup on Social Work Licensure Requirements Results of Final Vote, Next Steps and Plan for 4/30/24 Workgroup Meeting

Members of the MD Workgroup on Social Work Licensure,

I want to Thank You and let you know how much I appreciate your service as a member of the Workgroup, especially in giving of your time and attention to complete our appointed tasks.

After our last meeting on March 26, 2024, Ms. Guggino sent a ballot to record the vote of Workgroup members not in attendance for the binding vote on task #1 of SB871. The vote was tabulated as **Yes Votes** = 15, **No Votes** = 4, and **Abstention** = 1, with the results indicating the majority voting in favor of eliminating the ASWB exam as a requirement for licensure at the BSW and MSW levels. There are also 2 non-voting Workgroup members. Next steps will include identifying potentialities with the elimination of the ASWB exam as a requirement for licensure, and implementation of new processes, including increasing staffing to handle an increase in applicants, concerns with the grandfathering process, and enacting new regulations related to licensure.

The Interim Report is due on May 31, 2024. Therefore, the Workgroup will need to finalize the Draft Interim Report at the 4/30/24 Workgroup meeting. The Draft Interim Report will include an Executive Summary, an Introduction, Background Information, Findings and Recommendations, a Conclusion, and Appendices.

The Draft will be sent to the Workgroup prior to the 4/30/24 meeting for review.

Other agenda items for the April 30, 2024 Workgroup meeting are listed below:

- Briefing from Joel L Rubin, MSW, ACSW, LSW, CAE, Executive Director - NASW-Illinois, on best practices, and lessons learned from the implementation of licensing without the ASWB exam and establishment of alternate pathways to licensing.
- **Tentative:** Briefing from NASW - Virginia on the licensure process and requirements in Virginia
- **Tentative:** Briefing from the Virginia Board of Social Work on the licensure process and requirements in Virginia

Please feel free to contact me for any questions or additional information.

All the Best,

Karla J. Abney, MSW, MSN, LMSW
Chair

April 28, 2024

Karla Abney, MSW, MSN, LMSW

Chair, Maryland Workgroup on Social Work Licensure

c/o Office of Healthcare Workforce Development

Maryland Department of Health

201 West Preston Street

Baltimore, MD 21201

Dear Chair Abney,

We read with interest the communications submitted by Dale Atkinson, Esq. and Cara Sanner of the Association of Social Work Boards (ASWB) as well as Karen Richards, LCSW-C, and Susan Coppage, LCSW-C of the Maryland Board of Social Work Examiners (BSWE). We wish to present an alternative viewpoint, addressing specific claims to ensure our discussion reflects a comprehensive and balanced understanding of the issues at hand. Should ASWB and BSWE be permitted to attach their letters to the initial recommendations, we request that this letter also be included as an attachment.

1. Allegations of Structural Inequity:

The ASWB's claim of "structural inequity" within our process is paradoxical, considering their current and historical role in perpetuating such inequities. Disaggregated data has demonstrated persistent disparities in test outcomes related to race, disability, age, and language proficiency under ASWB's purview. Despite these long-standing issues, ASWB has only recently begun to address them, largely due to public outcry following their data release in August 2022.

This context is vital, as it underscores the necessity of our current efforts to explore alternative licensing methods that may offer more equitable outcomes. Our Workgroup is able to elevate voices that have historically been suppressed in this discussion. We are hardly perpetuating structural inequity - we are actively working to reduce its impact.

2. Representation of Diverse Viewpoints:

The ASWB and BSWE's assertion that opposing viewpoints are absent from the Workgroup composition requires correction. The open appointment process to the Workgroup allowed anyone fitting Workgroup membership criteria to apply for a position **without regard** to their opinion towards SB871 of 2023. This allowed for a diverse range of participants, including our Chair, who initially opposed this legislation. Her leadership has been nothing short of diplomatic, prioritizing the best interests of Maryland Social Workers over any organizational allegiance. This has ensured a balanced representation of opinions without regard to monetary or political influence outside of the Workgroup.

The majority of Workgroup members, except those affiliated with ASWB, voted to eliminate exams at the LBSW and LMSW levels - this serves as a notable piece of data rather than proof that the Workgroup is biased. Furthermore, it is noteworthy that the ASWB chose to fill one of their two designated slots with a legal representative who is neither a subject matter expert in the areas under discussion by the Workgroup nor a resident of Maryland. This decision raises questions about the ASWB's commitment to addressing the specific needs and context of Maryland Social Workers. It seems contradictory for the ASWB to accuse the Workgroup of biased viewpoints when their own appointment does not align with the expertise required to contribute to our deliberations on licensure recommendations effectively.

3. Full Discussion of Mandate's Scope:

The criticism regarding the purported haste in concluding discussions on licensure examination overlooks the structured timeline set by the Workgroup, which extends into 2025. This timeline strategically allows us to address initial recommendations promptly while reserving ample time for deeper exploration of more complex issues. For instance, while topics like supervision challenges are critical for the Workgroup, recommendations for these are scheduled for discussion at the end of this year. It is worth noting that our December 5th meeting involved a nuanced examination of the implications of exam removal, enriched by insights from various professional fields.

Including the ASWB was a necessary decision intended to provide them an opportunity to demonstrate their commitment to improving relations with Maryland Social Workers, particularly those adversely impacted by the licensing exam. However, the tone and content of their recent communications, including this most recent letter, suggest that their primary focus remains on protecting their financial interests and influence rather than engaging in sincere analysis and reform.

Moreover, the ASWB's continued [denial of bias](#) in their exams as recently as February 2024, despite substantial contrary evidence, further questions their commitment to transparency and accountability. The impact of the letters from the BSWE and ASWB is troubling; they demand that Workgroup members—many of whom are practicing Social Workers and include individuals directly impacted by the exam—blindly trust their proposed reforms without presenting clear, actionable plans for change.

This ongoing situation underscores a prioritization of their own interests over those of the broader Social Work community, which is counterproductive to the goals of our Workgroup. As we move forward, it is imperative that all involved parties adhere to the principles of openness, accountability, and genuine reform to serve the needs of Maryland Social Workers and, therefore, vulnerable Maryland residents.

4. Transparency and Bias in Discussions:

Concerns about transparency and bias were specifically noted in the March 26th meeting, where the decision-making process was questioned. It is crucial to highlight that our deliberative approach has involved extensive debates and comprehensive presentations, which have been inclusive of *all* viewpoints. Despite claims that presenters have been biased in favor of exam removal, the CEO of ASWB was, in fact, able to present about their exams at the January 30th, 2024 meeting. The decision to explore alternatives to traditional examinations was not an outcome of bias but a reflection of a majority agreement among Workgroup members based on thorough deliberation and evidence presented.

5. Engagement and Participation Issues:

Regarding the claims that ASWB representatives were silenced or that their participation was restricted, video recordings from our meetings (specifically referenced from the December 5th and March 26th sessions) clearly show that all members, including those from ASWB, were provided equal opportunity to contribute. If there was any lack of engagement, it was not due to procedural barriers but rather personal or organizational decisions. In fact, even as part of the minority of Workgroup members who are compensated by their organizations while they attend the Workgroup meetings, ASWB and BSWE have been notably inflexible in scheduling and unwilling to defer to the volunteer Workgroup members who are not paid for participation, with some even losing income to be present at the Workgroup.

Finally, the full context of our discussions and the methodologies employed by the Workgroup depict a different narrative than the one presented in the letters submitted by the ASWB and BSWE. Overall, the Workgroup's efforts have been an inclusive, transparent, and effective examination of all aspects of Social Work licensure in Maryland. The primary source of divisiveness appears to be the non-resident ASWB Workgroup members and, more recently, the BSWE.

We remain dedicated to our mandate, ensuring that the final outcomes represent the best interests of the Social Work community and the areas in which they serve. Our Workgroup's democratic voting process means that not everyone will be satisfied with the outcomes, but this is both the challenge and the privilege of democracy—no one is able to get their way all the time.

Thank you for your time and consideration.

Sincerely,
Philicia Ross, LCSW-C
NAACP Appointee for the Maryland Workgroup on Social Work Licensure

Dr. Christa Gillam, PhD, MSW
Baltimore Legacy Chapter of the Association of Black Social Workers Representative

Temeka Bailey, LCSW-C, LICSW
NGO Representative Serving Central Maryland

cc:

Kathy M. Guggino, MPA, PhD

Members of the Maryland Workgroup on Social Work Licensure

February 13, 2023

○ **Tarahh Harris, MSW Community Engagement Manager North Barclay Green**

○ **Recommendations on continuing use of the ASWB exam for the LBSW and LMSW;**

As a person of color who has taken the exam on at least five occasions, I think it is imperative that we remove the LBSW and LMSW as a requirement to practice. After earning a degree from an accredited University, a person should have learned and acquired the skill set to be able to practice in the profession of Social Work. I believe that there are some benefits to requiring the clinical exam if you want to practice Clinical Social Work. However, research has proven and indicated that the ASWB exam is culturally biased and often minimizes the diversity of all exam participants. In addition, there should be alternative ways to become licensed other than a written exam. Myself along with many others who I am aware of have failed the exam by one or two points. Does that mean that the person doesn't have the skills to be an effective Social Worker? I beg to differ. In addition, the ASWB should not be the only entity to be able to offer an exam, there should be other alternative providers for the exam. This allows for more transparency in diversity and could have a large impact on exam outcomes. On a personal note, not being able to pass the exam caused me to shift my career path. I would hope that the ASWB takes a long hard look at how their current exam is potentially preventing skilled workers from making an equitable living and decent wage.

○ **Whether to establish a temporary license for those who meet the LBSW and LMSW requirements but have not passed the ASWB exam.**

Not only should a provisional license be provided for those who are not able to pass the ASWB exam. Alternative pathways such as firsthand work-life experience, supervision hours, completion of an oral exam could also be an option. In addition, an essay-based exam that covers 5-10 major components of the Social Work field could be offered. Each question could be worth a maximum of 20 or 10 points depending on the number of questions. A standardized multiple-choice culturally biased exam does not indicate an individual's knowledge and ability to be an effective Social Worker.

○ **How supervision could be provided to LBSWs/LMSWs at no cost to the licensees.**

Supervision could be provided by those who are licensed already while identifying various benchmarks and goals to be met through a learning contract. Supervision should involve specific and measurable goals that provides the professional with tools and skills to be successful. Once complete, a professional could receive a certified certificate of completion. The professional can provide a presentation or demonstration on what they learned about the field of Social Work during their supervision experience. A requirement to maintain your eligibility to continue to practice SW could be completing a certain number of C.E.U.s yearly.

May 2, 2024

Dear Ms. Guggino:

I am writing to you as a member of the public to offer my feedback for attachment to the interim report. Thank you for your consideration.

I am a lifelong Maryland resident and a clinical social worker in Washington, DC. I started my social work career in DC and did not apply for Maryland licensure due to the inconvenience and extra expense of holding multiple licenses. I have been a social worker for 13 years, a clinical social worker for ten, and a clinical supervisor for eight. I am at a point in my career where I would love to put a small dent in the supervision crisis in my home state, but due to Maryland's unnecessary and cumbersome regulations, I am ineligible for a clinical license in Maryland.

Additionally, I know many fabulous BIPOC social workers whose only impediment to licensure has been ASWB exams. These exams have no proof that they measure social work competence and no proof that they are correlated with public protection, but yet they keep many great social workers out of our field. Therefore, I have watched most of the Maryland Social Work Licensure Workgroup meetings with great interest.

The Association of Social Work Boards (ASWB) was one of few entities afforded two representatives to the Workgroup. As someone who helped advocate for SB871 of 2023, I looked forward to observing detailed discussions of exam psychometrics, the exam writing process, and ASWB's anti-bias measures from their representatives, who would surely be well-versed in these components of the exam.

Unfortunately, ASWB's choice of representatives was not ideal for the stated goals of the Workgroup. They elected to send their attorney as well as their Regulatory Support Services Program Manager. Neither are well-versed in the exams at the level of detail required to be effective additions to the workgroup. I can only conclude from ASWB's representative choices that ASWB is most interested in retaining its financial and political influence rather than engaging in a meaningful discussion and reform. Their "just trust us, we're working on it" attitude is, after 40 years, simply not dependable. Further, neither ASWB representative is a Maryland resident, and one ASWB representative has engaged in behavior that has been concerning to me as a member of the public. That person has needed to be reminded by Workgroup leadership about meeting protocols on multiple occasions.

I can understand that the ASWB and the Board of Social Work Examiners (BSWE) - a member of ASWB - are probably upset that their preferred findings were not the majority opinion for the preliminary Workgroup recommendations. However, the idiom that immediately comes to mind is: **"When you are accustomed to privilege, equality feels like oppression."** I have welcomed the diverse perspectives and can see how the Workgroup has benefitted from the fact that ASWB and BSWE are involved in, but not leaders of, this Workgroup. The licensure

and exam challenges have occurred under their purview; it is well past time to seek a broader diversity of perspectives.

Chair Abney has ensured that everyone has equal opportunity to speak during the Workgroup, putting aside her personal opinions. SB871 of 2023 intentionally created a large diverse workgroup, and this workgroup has ensured that within the workgroup, those holding power and influence outside of it have equal footing with people whose voices and opinions have been historically suppressed. Presenters have been varied in perspectives - yes, some presenters have had an opinion slanted towards exam removal, but there have been some pro-exam presenters, too. Most social workers in 2024 have strongly held beliefs about ASWB licensing exams, and it would be impossible to have a useful panel of "neutral" presenters. I have learned from most presenters even if I have disagreed with their stance on examinations.

It is unfortunate that not everyone will be satisfied with the outcome of the interim vote. However, just because ASWB and BSWE are dissatisfied with the outcome does not mean that the outcome is a result of bias or unfair practices. It is the result of thoughtful social workers and other interested parties engaging in careful deliberation about how to correct a long-standing injustice. Indeed, the National Association of Black Social Workers (NABSW) published a position paper in [1983](#) that examinations and licensure were not for protection of the public, but protection of the income of social workers, resulting in stratification of social work. NABSW was unfortunately prophetic, and I will be an exceptionally proud Marylander when we begin eliminating harmful, unnecessary barriers for talented social workers to practice.

Sincerely,
Rachel Doyle, LICSW
District 21

Appendix E: Letters from Government and Non-governmental Organizations



Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Secretary

Maryland Board of Social Work Examiners
4201 Patterson Ave
Baltimore, MD 21215

April 26, 2024

Karla Abney, MSW, MSN, LMSW
Chair, Maryland Workgroup on Social Work Licensure
c/o Office of Healthcare Workforce Development
Maryland Department of Health
201 West Preston Street
Baltimore, MD 21201

Dear Chair Abney,

The Maryland Board of Social Work Examiners (BSWE) is a duly appointed member of the Maryland Workgroup on Social Work Licensure, established with the passage of SB 871 (Ch. 228, Acts of 2023). We are writing this letter in support of the concerns presented by Mr. Atkinson and Ms. Samner of ASWB in their letter dated April 24, 2024.

BSWE representatives to the Workgroup have included Board members and Board staff. All participants have reported similar issues to those raised by ASWB. When in both the main workgroup and sub-committee meetings, members have felt stymied in their ability to express opinions that are contrary to eliminating the exam for bachelor's and master's level social workers.

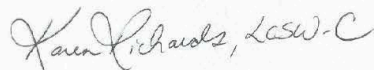
BSWE acknowledges the concerning issues presented by ASWB exam data. However, it appears the Workgroup is unwilling to fairly acknowledge or assess changes ASWB has been working to implement to address the issues of that widely published study data. Alternatively, there has been little discussion of how other Health Occupation Boards are addressing similar issues. Are other professions removing exams as a minimum criterion for competency to practice? We would like to point to a link to an article from the National Council on Mental Wellbeing which discusses the challenges of licensing exams and recruiting mental health workers: [Licensure Exams Test Our Ability to Improve Recruitment - National Council for Mental Wellbeing \(thenationalcouncil.org\)](#). The article references the ASWB exam while also offering several links and references as to how professions are addressing these issues. Greater discussion around finding ways to enhance social workers' ability to become licensed should be part of the robust discourse during the Workgroup's meetings and sub-committees.

As noted in ASWB's letter, the condensed meeting timeline of the Workgroup, due to delays, hampered dialogue around other alternatives to eliminating the exam such as issuing temporary licenses or increasing access to exam prep courses. There has been limited discussion on the professional impact of removing the exam for social workers. This Workgroup seems unwilling to consider or present facts against removal of the exam. Including, as noted by ASWB— other than ASWB and BSWE, there are no social workers in support of the exam represented in the Workgroup. As pointed out by Mr. Atkinson and Ms. Sanner, numerous Maryland licensed social workers testified in opposition to SB 871 and the removal of the exam requirement, which contributed to the removal from the bill a moratorium on the exam.

Additionally, the Workgroup has relied heavily on presentations and speakers with affiliation to exam removal. While BSWE recognizes and appreciates all that NASW and other organizations do to advocate for social workers, there has been little input from the regulatory body for licensing. That responsibility lies with BSWE. As such, any discussion of the impact on social work applicants for State licensure should include the Board's position on this issue, as well as ASWB's.

In closing, we request that this letter also be submitted as an attachment to the preliminary report to the legislature for the same reasons as ASWB's letter.

Respectfully,



Karen Richards, LCSW-C
Executive Director, BSWE



Susan P. Coppage, LCSW-C
Board Chair, BSWE

cc: Rhonda L. Edwards, Deputy Counsel for Boards & Commissions, MDH
Marie Grant, JD, Assistant Secretary of Health Policy, MDH
Kathy M. Guggino, MPA, PhD., Office of Healthcare Workforce Development, MDH
Lillian Reese, Legislative & Regulations Liaison, Health Occupations Boards & Commissions
Members of the Maryland Workgroup on Social Work Licensure



Association of Social Work Boards

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April 23, 2024

Karla Abney, MSW, MSN, LMSW
Chair, Maryland Workgroup on Social Work Licensure
c/o Office of Healthcare Workforce Development
Maryland Department of Health
201 West Preston Street
Baltimore, MD 21201

Dear Chair Abney,

As duly appointed members of the Maryland Workgroup on Social Work Licensure (Workgroup) we formally request the submission of this letter to the Workgroup record. If it cannot be made part of the record, we respectfully ask that you notify us accordingly in writing. We want to emphasize that this submission follows extensive deliberation on our part. Please know that we submit this letter only after careful consideration. Our aim is to highlight significant concerns regarding the administration of the Workgroup, particularly in relation to compliance with the legislative mandate of Senate Bill 871 of 2023.

Regrettably, the process has been marred by structural inequity, hindering open discussion and appropriate consideration of the issues. Under the current leadership, the Workgroup has failed to cultivate an environment conducive to the expression of diverse viewpoints, critical thinking, and thoughtful decision-making. From the outset, the elimination of an examination requirement for bachelor's and master's social workers has been presented as a foregone conclusion, depriving members of the opportunity to engage in meaningful dialogue, explore alternative options, and comprehend potential consequences.

For these reasons, we implore that our outlined concerns be formally documented as an integral part of the Workgroup record.

1. Delays in convening the Workgroup condensed the meeting timeline, leaving insufficient time for deliberation before recommendations were due. SB 871 of 2023 required a preliminary report by September 1, 2023, and an interim report by December 1, 2023. However, the first Workgroup meeting occurred on October 24, 2023, with subsequent biweekly meetings through January 30th. Meetings generally focused

on informational sessions with briefings given on various topics which although relevant consumed meeting time. The Workgroup was presented with the Workgroup's mandate on December 19th meeting but did not formally discuss it until January 9th. Subgroups were assigned on January 30th and tasked with providing preliminary recommendations by February 16th. Unexpectedly, on March 5th, we were notified that the subgroup meetings were canceled. Members were advised that Workgroup leadership would be sending a communication to summarize a discussion held with subgroup chairs and clarify the focus and next steps for the workgroup as a whole and the work to be done by each of the subgroups. However, information was never shared regarding discussions held with subgroup chairs. Instead, the Workgroup was notified that the focus of our work would be identifying potentialities with the elimination of the use of the licensing exam and the impact this would have on the licensing board.

2. Subgroup organization proved ineffective, lacking adequate time for tasks and integration with the Workgroup.
 - a. Four subgroups were announced to the Workgroup on December 28, 2023, with leadership defining their charges, yet only one was designated to address the Workgroup's mandate.
 - b. Subgroups were created at the January 30 Workgroup meeting. Subgroups were asked to meet and have preliminary reports submitted by February 16th, in time for the February 27th meeting of the Workgroup. The subgroups were only able to meet once or twice before the deadline to provide substantive feedback to the Workgroup.
 - c. Subgroups prepared written communications to document their group activity and discussion, however these reports were not shared with the full Workgroup at the February 27th meeting. They were only briefly discussed with no written materials presented at the meeting or made available onscreen in a way that would facilitate understanding of the discussion.
 - d. Lack of cross-subgroup discussion deprived the Workgroup members of broader insights and hindered collective understanding.
 - e. External individuals not appointed to the Workgroup were invited to participate in subgroup activities, influencing recommendations.
 - f. Some Workgroup members, including ASWB representatives, were denied subgroup participation, fostering an echo chamber effect, and hindering critical thinking by limiting exposure to diverse perspectives.
 - g. Subgroups were given a new charge to focus exclusively on elimination of the testing requirement before there was an opportunity to discuss the Workgroup's full charge as mandated by Senate Bill 871 of 2023.
3. Strategies were employed to silence dissenting opinions regarding the removal of the examination requirement.
 - a. Many Maryland Licensed Social Workers testified in opposition to SB 871 of 2023 and the removal of the licensing exam requirement. In part, it led to the removal of the exam moratorium from the bill and the creation of the Workgroup. However, their representation was absent from the Workgroup composition.

- b. Ahead of the December 5th meeting, a draft letter, intended for ASWB CEO Dr. Stacey Hardy-Chandler, was circulated by Workgroup leadership. The letter aimed to replace ASWB appointees to the Workgroup with subject matter experts, implying ASWB participants lacked qualifications despite their extensive expertise. The letter was never formally sent to ASWB's CEO, despite the circulation within the Workgroup.
4. Information to communicate the contents of the preliminary report to the legislature has not been provided to the Workgroup in a manner that permits appropriate review and discussion by Workgroup members. The February 27th meeting minutes include information and subgroup recommendations that were not presented to the Workgroup in a way that permitted members to understand the breadth of what was discussed in subgroups and to then be able to consider and discuss the ideas further. Despite the absence of deliberation among Workgroup members regarding the retention or removal of the examination requirement, a discussion occurred during the February 27th meeting to take an informal "straw poll" on whether to retain the requirement for bachelors and masters social workers potentially biasing it toward the removal of examination requirements without comprehensive discussion or attempt at consensus decision-making. All Workgroup members were not able to participate in the straw poll vote, and some requested that they abstain from voting. The vote was repeated at the March 26th meeting, again, without any substantive discussion or exchange of ideas from Workgroup members. There was no call for debate once the vote was and will now be included in the preliminary report as a final recommendation. Further, the draft
5. Despite nearly five months of regular meetings, Workgroup members have yet to discuss the mandate's scope fully. Early meetings highlighted serious challenges in obtaining supervised experience in Maryland, yet substantive discussion of the underlying reasons and potential solutions have been lacking. A key component of the legislative mandate is for the Workgroup to conduct a study that examines each category of license regulated in Maryland. The examination includes assessing bias concerns tied to license qualifications, determining if the license category is necessary, identifying if there are possible viable alternatives to licensing examinations to assess applicants competence to practice, considering policies to ensure bias-free examinations, and identifying barriers other than examination that present challenges for individuals seeking social work licensure in the state. The fact that the Workgroup's mandate was not discussed with the Workgroup for the first several months of meeting, and even in that discussion substantive aspects of the mandate have not been discussed, casts doubt that the Workgroup can be administered in a functional manner and effectively carry out the duties entrusted by the Maryland Legislature through Senate Bill 871 of 2023.

In conclusion, the Maryland Workgroup on Social Work Licensure has encountered numerous challenges and shortcomings in its administration and execution of duties, as outlined in Senate Bill 871 of 2023. Delays in convening the Workgroup, ineffective organization of subgroups, limitations on diverse opinions, and the failure to fully engage with the mandate's scope have hindered meaningful progress and decision-making. These deficiencies have resulted in a lack of transparency, insufficient discussion on critical issues, and biases in the preliminary report. Such shortcomings cast doubt on the Workgroup's ability to function effectively and fulfill its legislative mandate. Moving

forward, it is imperative that the Workgroup addresses these concerns, fosters an environment conducive to open dialogue and diverse perspectives, and ensures comprehensive exploration of all aspects of social work licensure in Maryland. Only through these efforts can the Workgroup regain trust, enhance its functionality, and effectively serve the needs of the Maryland Legislature and the social work community.

In closing, we request this letter be submitted as an attachment to the preliminary report to the legislature. This request is based on our concerns that the process to date has not fulfilled the intent of the legislative mandate of Senate Bill 871 of 2023 to thoroughly consider the role of licensure, the use entry level competence assessments, and the important governmental role of public protection. The abbreviated process has not permitted all voices and perspectives to be considered.

Respectfully,

Dale Atkinson, Esq.
Cara Sanner

cc:

Kathy M. Guggino, MPA, PhD
Members of the Maryland Workgroup on Social Work Licensure



Association of Social Work Boards
Report for the Maryland Social Work Licensure Workgroup
January 30, 2024

INTRODUCTION

The purpose of this report is to contribute to the ongoing work of the Maryland Social Work Licensure Workgroup. The Workgroup was formed at the direction of Senate Bill 871 of 2023. This report provides information central to the deliberations of the Workgroup. ASWB respectfully requests it be added to the Workgroup record to support future conversations and recommendations. Of paramount importance for the Workgroup is to consider whether Maryland should continue its use of licensing examinations developed and administered by the Association of Social Work Boards (ASWB) as a requirement for a bachelor social worker license or a master social worker license. The ASWB licensing exams have come under scrutiny following the groundbreaking, voluntary publication of disaggregated exam pass rate data in 2022. While descriptive and limited in nature, the data demonstrated disparities in pass rates with the greatest differences seen amongst Black licensure candidates as compared to their White counterparts.

ASWB published the [2022 ASWB Exam Pass Rate Analysis](#) as part of the association's commitment to participating in data-driven conversations around diversity, equity, and inclusion. The data publication offers the social work profession a historic opportunity to lay the groundwork for addressing systemic and institutional factors that disproportionately affect Black licensure candidates and those of other historically marginalized groups. ASWB is actively seeking short- and long-term solutions by taking concerted action. ASWB is striving for collaboration with social work regulators, the education community, licensed professionals, and other key stakeholders, so that each can work from its sphere of influence to address the systemic factors responsible for disparate testing outcomes.

Licensure exams are the only uniform and objective tool available to regulators to ensure the public is served by qualified and competent practitioners. Eliminating a core licensing standard threatens to delegitimize social work as a professional practice. Doing away with exams would be a shortsighted solution to a complex problem. Social justice and equity are central to the Workgroup's mandate. This important directive demands critical thinking, as well as a thoughtful and reasoned response.

SOCIAL WORK IS A LICENSED PROFESSION

It is critical to discuss the purpose of professional licensure. Social work is a licensed profession because it has a significant impact on the health and wellbeing of vulnerable client populations. The purpose of licensure is this critical public protection mandate. At the same time, professional licensure serves to protect the profession by upholding professional standards. The recognition of these tenants is demonstrated in the legislative intent of the Maryland Social Work Practice Act which states that:

§ 19-102. Legislative policy

(a) The General Assembly finds that the profession of social work profoundly affects the lives, health, safety, and welfare of the people of this State.

(b) The purpose of this title is to protect the public by:

(1) Setting minimum qualification, education, training, and experience standards for the licensing of individuals to practice social work; and

(2) Promoting and maintaining high professional standards or the practice of social work.

When governments elect to regulate a profession and require licensure as a prerequisite to lawful practice, the regulatory process must adhere to constitutional and statutory requirements – otherwise known as due process or fairness. Fairness requires the governmentally created Social Work Board – which has been delegated with regulatory authority – to be able to substantiate its decisions. This is especially true when taking an adverse action such as denying an application for licensure or renewal.

The Maryland Social Work Practice Act delegates authority to the Maryland State Board of Social Work Examiners to regulate the profession of social work. The Board serves as an arm of government. ASWB is a nonprofit 501(c)(3) organization whose members comprise the government agencies responsible for licensing and regulating the profession of social work. ASWB has 64 member jurisdictions, including the Maryland State Board of Social Work Examiners. ASWB was formed 44 years ago by a group of social work professionals seeking to be a regulated profession through the development of a national, uniform, and objective standard of competence measurement to manage entry to the profession. The licensing exams serve as the only component of the licensure decision overseen by state regulatory entities. This standard exists throughout all U.S. regulated health professions and occupations.

As an ASWB Member Board, Maryland has all rights of attendance, leadership, and election to the Board of Directors and participates in policy setting, elections, resolutions, and technical reports related to ASWB programs and services; including the psychometric validity of entry-level competence exams.

WORKGROUP CHARGES PURSUANT TO SENATE BILL 871 of 2023

The Workgroup was first convened on October 24. Subsequent meetings were held on November 14, December 5, and December 19. ASWB finds that the Workgroup will best be served if members have the benefit of reviewing and discussing each of the individual charges in a collective group. This process is important to a shared understanding of the scope of work to be undertaken, to foster effective working relationships, and to ensure a process to successfully achieve defined outcomes. The Workgroup mandate is excerpted from SB 871 and reads as follows.

[2023 Regular Session - Senate Bill 871 Enrolled \(maryland.gov\)](#)

The workgroup shall:

1. determine:

- i. *whether to continue to use examinations developed by the Association of Social Work Boards (ASWB) as a requirement for a bachelor social worker license or a master social worker license;*
- ii. *whether to establish a temporary license for applicants for a bachelor social worker license or master social worker license, who, except for passing the required examination, meet the education and experience requirements for licensure;*
- iii. *how supervision may be provided to bachelor social worker licensees and master social worker licensees at no cost to the licensees; and*
- iv. *if the workgroup determines that the ASWB examination should not be used or that temporary licenses should be established, whether additional experience or education requirements are necessary.*
- v. *A timeline for phasing in any determination made under item (i), (ii), (iii), or (iv) of this item; and*
- vi. *An outline and timeline for conducting the study required in subsection (h) of this section; and*

2.i. on or before September 1, 2023, submit a preliminary report of the findings and recommendations required under item 1i – 1iv of this subsection to the Senate Finance Committee and the House Health and Government Operations committee in accordance with Section 2-1257 of the State Government Article; and

2.ii. on or before December 1, 2023, submit an interim report of the findings and recommendations required under item (1)(i) through (iv) of this subsection and the outlines and timelines required under item (1)(v) and (vi) of this subsection to the Senate Finance Committee and the House Health and Government Operations Committee in accordance with Section 2-1257 of the State Government Article.

h.1 Further, the Workgroup must conduct a study that examines each type of license under the Maryland Social Workers Practice Act (Title 19 of the Health Occupations Article) by:

(i) conducting a bias analysis of the qualifications for each type of license;

(ii) determining whether each type of license is necessary;

(iii) identifying alternatives to examination requirements that may be used to assess an applicant's qualifications for each type of license;

(iv) considering examination testing options including the development of a State-based competency examination, minimum requirements for a national examination to be approved for State applicants, utilization of ranges of examination scores, and other policies to ensure a bias-free examination;

(v) identifying barriers in addition to the examination that present challenges to licensure in the State; and

(vi) identifying the circumstances under which unlicensed individuals work in State and federal government positions as social workers; and

2. On or before December 1, 2024, report to the Senate Finance Committee and the House Health and Government Operations Committee, in accordance with Section 2-1257 of the State Government Article, on its:

i. findings under item (1) of this subsection; and

ii. recommendations to eliminate bias and make the process for licensing social workers in the State more fair, diverse, and efficient.

CENTRAL ROLE OF EXAMINATION IN LICENSE ISSUANCE

The below table identifies licensing requirements for the practice of social work in the State of Maryland. The necessary qualifications center on a candidate's fitness for social work practice, a passing score on the required exam, a corresponding degree from an approved education program, and supervised practice experience.

State of Maryland Social Work Licensing Requirements by License Category

Licensure Category	Application and Fees	18 Years of Age	Good Moral Character	Criminal Background Checks	Pass an Examination Prescribed by the Board	Education	Supervision (post graduate)
Bachelors	√	√	√	√	√	Bachelors degree from CSWE program	BSW-independent practice, 3 years and 4500 hours
Masters	√	√	√	√	√	Masters degree from CSWE program	MSW-2 years and 3000 hours.
Clinical	√	√	√	√	√	Masters degree and 12 hours of academic credit in clinical course work from program accredited by CSWE	Clinical-2 years and 3000 hours.

Education, supervised experience, and moral character are licensure determination components that all contain elements of subjectivity and judgement. The only objective component is the licensure exam.

Each plays an important and distinct role in assessing licensure eligibility. Together, these criteria offer boards multiple data points equipping them with the elements toward which more equitable and just decisions can be made.

Professional licensure examinations offer the only continuously vetted, objective measure of entry-to-practice competence in licensure issuance decisions. Their development involves robust anti-bias measures and embeds layers of checks and balances. As with engineering, medicine, nursing, psychology, and other professional disciplines, social work examinations are reliable, valid, and involve a psychometric process that follows industry standards developed jointly with the American Educational Research Association, the American Psychological Association, and the National Council on Measurement in Education.

There are distinct differences between a social work exam and an educational degree; one does not replace the other in making licensing issuance decisions. A social work education gives social workers a holistic understanding of the profession, while the exam offers a look at the social worker's knowledge, skills, and abilities as they enter the profession. A social work degree and a social work licensing exam are complementary tools that help regulators make licensing decisions. Either one without the other presents an incomplete picture of a licensure candidate's ability to practice immediately and over time.

Educational programs focus on foundational knowledge over the course of the approximately two to six years a student matriculates through a program. Even under the broad umbrella of "accreditation," they are highly varied in instructional approach and student experience. Factors such as academic freedom, array of concentration/specialization areas, student school selection, faculty composition, and research agendas all point to vast differences – even across Maryland schools. It is notable that even accredited social work programs do not blanketly accept courses from other accredited programs. Each assesses transfers against their own individual academic priorities. The varied nature of educational programs directly supports the need for a uniform postgraduate exam of the knowledge, skills, and abilities of licensure applicants expected to ultimately serve the public.

Professional licensure exams are the only part of license issuance decisions overseen by regulators themselves. Educational degrees and supervised experience are other aspects of the licensure issuance equation. Each of these three components offers critical and distinct information that cannot be substituted by the other two; they are complementary, not interchangeable. Combined, all three components effectively serve as a licensure accountability equation that offers the level of regulatory diligence and oversight that communities served by social workers deserve. The removal of the exam requirement diminishes regulatory accountability to the public whose health and wellbeing must be best served by government.

2022 ASWB EXAM PASS RATE DATA ANALYSIS

In August 2022, the Association of Social Work Boards became the first health or human service regulatory association to publish a pass rate analysis report with disaggregated data. The [2022 ASWB Exam Pass Rate Analysis](#) is part of the association's commitment to participating in data-driven conversations around diversity, equity, and inclusion.

The analysis revealed outcome disparities across demographics like age and race. However, it is critical that we not mistake outcomes for origins. The descriptive data included as part of the report cannot be

used to draw causal relationships. When interpreting the findings presented in the report, it is important to keep in mind the limitations of the available data. The demographic variables depicted in the findings are based on self-reporting and limited by the response options available to each test-taker at the time of exam administration. The options may not reflect the various ways that individuals identify and describe themselves. This is particularly the case for categories related to gender and race/ethnicity.

Furthermore, candidates for licensure – across demographic subgroups – do not necessarily have access to the same resources or opportunities prior to their test dates. To assume as much requires making broad conclusions about the capabilities of certain subgroups.

ASWB views the data presented in the 2022 report as an important starting point in a collective process to better help all licensure candidates be equally prepared for success on the social work licensing exams. By establishing a baseline, these data have enabled a conversation about how the social work profession collectively gets from where we are now to where we want to be.

ASWB EXAMINATION PROGRAM

The [ASWB social work licensing exam program](#) depends on the hard work of a diverse group of volunteers, consultants, and contracted item writers committed to public protection. Together, these social workers ensure the ASWB exams remain fair, valid, and reliable.

Every question, or item, on the social work licensing exams is written by a practicing social worker and depends on verifiable social work knowledge. Item writers are practicing social workers contracted by ASWB to write questions for the social work licensing exams. ASWB works to recruit item writers who are representative of the social work profession.

Item writer applicants must:

- Have a degree in social work
- Have a current, valid social work license or Canadian registration
- Be currently practicing social work (Teaching social work courses is also considered practice.)
- Complete all application and screening documents
- Be available to attend a weekend training session (online or in-person) during the summer
- Sign agreements acknowledging that the item writer:
 - Will keep all examination materials confidential
 - Will not participate in creating or teaching any licensing examination preparatory courses or materials
 - Will not take an examination in any category to which the writer has contributed for at least one year

The tables below show racial/ethnic and gender proportions of active item writers in 2023, as compared to [2021 data on social work graduates compiled by CSWE](#).

More information on the individuals who serve as ASWB's item writers – as well as other components of the Examination Program can be found [on the ASWB website](#).

Race / Ethnicity of active exam item writers as compared to 2021 CSWE-reported graduates

	Black / African American	Native / Indigenous people	Asian / South Asian / Pacific Islander	Latinx / Hispanic	White / Caucasian	Multiracial / Biracial	No response
ASWB item writers	20.3%	1.6%	7.8%	6.3%	51.6%	10.9%	1.6%
2021 MSW	18.2%	1.6%	3.7%	15.9%	54.1%	2.9%	3.6%
2021 BSW	21.4%	1.3%	2.7%	19.4%	49.8%	3.6%	3.2%

Gender of active exam item writers as compared to 2021 CSWE-reported graduates

	Female	Male	Nonbinary/Other	No response/Unk.
ASWB item writers	82.8%	15.6%	1.6%	0.0%
2021 MSW graduates	82.1%	12.4%	0.0%	5.5%
2021 BSW graduates	87.0%	11.5%	0.1%	1.3%

ASWB’s exam development program is also supported by a volunteer committee made up of successful former item writers who serve as subject matter experts representing the diversity of the social work profession. The Examination Committee, appointed by the ASWB Board of Directors, typically meets up to four times a year to review and approve questions for use on the ASWB exams.

ASWB also contracts with experienced social workers who work directly with item writers to create the questions presented to the Examination Committee. The consultants are all successful former item writers and Examination Committee members. These consultants also attend Examination Committee meetings to provide guidance and gather feedback from the committee on the work of item writers.

Subject matter experts conduct a final review of each complete form of an exam before it goes online for administration. Form reviewers are primarily emeritus members of the Examination Committee.

More information about the ASWB exam program and the current committee members, item writers, consultants, and form reviewers is [available on the ASWB website](#).

ADDITIONAL ANTI-BIAS MEASURES IN EXAM ADMINISTRATION

In addition to the measures in place during exam development, every scored question on a social work licensing exam has passed through rigorous statistical analysis via pretesting and monitoring. This psychometric analysis is critical to the [validity, reliability, and fairness of the exams](#).

Pretesting exam questions is a critical part of ensuring exam fairness. ASWB contracts with independent psychometricians to analyze performance on pretest questions. When the Examination Committee approves a question, it becomes a pretest question. Before being used as a scored question, each question is given to hundreds of test-takers as an unscored question. Test-takers are not scored on pretest questions; instead, the pretest questions themselves are being scored.

Statistics gathered on pretest items answer many questions, including:

- Does this question have a clear, correct answer?
- Do test-takers from different backgrounds (e.g., gender, race, ethnicity) answer this question differently?
- What is the question's level of difficulty?

If a pretest question meets the exams' psychometric standards and does not show differential item functioning, it becomes a scored item on the exam. Each exam includes 20 pretest questions in addition to the 150 scored items. ASWB pretests this volume of questions so that there are always questions relevant to current practice moving into the bank of scored questions.

All questions continue to be monitored by psychometric experts to prevent any scored questions from being used that do not meet standards for fairness.

Like most high-stakes exams, the ASWB exam relies on DIF (differential item functioning) analysis to assess for measurement bias at the item (individual question) level. DIF is a stringent approach to test development, as items are screened individually during pretesting, and items that are identified as biased are deleted or revised before using them as operational (i.e., scored) items. Any exam item that displays DIF during pretesting is pulled from the pretest pool and does not make it into the pool of operational test items.

DTF (differential test functioning) analysis is the counterpart to DIF analysis and was initially proposed because item writing is an expensive and time-consuming effort, and evaluating a test for measurement bias, and, in turn, remedying said bias, could be achieved by identifying the smallest number of items that could be removed such that the bias at the test level would cancel. If ASWB were to run DTF analyses and rely on that information to remove problematic items, it is highly likely that the results of those analyses would lead to removal of far fewer items than does the DIF approach ASWB currently uses. ASWB is, nevertheless, exploring the potential value of using DTF analysis as an additional assurance of fairness.

Additional information on [the differences between DIF and DTF can be found here](#). More information on [the science of measuring competence fairly](#) is also available via the ASWB website.

CURRENT AND FUTURE ASWB EXAM INITIATIVES

In addition to its ongoing policies and practices designed to develop and administer a valid, reliable, and fair exam, ASWB has put into place a suite of initiatives aimed at further understanding and closing pass rate gaps among demographic groups. While ASWB recognizes that one organization alone cannot achieve the goal of undoing the effects of systemic and structural racism, the association is committed to doing its part to effect positive change by participating in profession-wide collaborations that allow those involved in the practice of social work to make more informed and inclusive decisions.

Community Conversations

From January to May 2023, ASWB engaged HumRRO, an independent nonprofit research and consulting firm, to collaborate with community partners in facilitating inclusive and productive conversations about

the social work licensing exams through [a novel research initiative called Community Conversations](#). This series of facilitated conversations among social workers was designed to gather information to be used as we develop exams for the future of social work.

The project consisted of in-person and virtual focus groups as well as a self-paced online survey available to anyone unable to attend a live session. The sessions prompted rich peer discussions that enabled more than 600 participants to share information on the phases of their social work journeys. From this input, HumRRO analyzed responses and developed recommendations that seek to engage the social work community in the licensure process and help address the structural challenges facing candidates seeking licensure.

Initiatives already undertaken that align with the research findings include:

- Increasing the diversity of representation among exam question writers, Examination Committee members, and [Practice Analysis Task Force members](#)
- [Providing education to the public about the item development process](#) and the ways that ASWB guards against bias
- Developing [new free resources for educators](#) and making the *ASWB Examination Guidebook* for candidates available as a free download
- Committing to making the [exams more accessible](#) by offering a remote exam administration option to increase exam access in 2024
- Launching the Social Work Census in March 2024 to include as many voices as possible in the exam development process

Longer term initiatives include:

- Exploring changes to the exam structure such as implementing a module-based exam structure that would allow test-takers who are unsuccessful to retake only part of the exam
- Seeking options to reduce financial impact for repeat test-takers by developing a scholarship program in collaboration with its exam administration partner, PSI
- Considering expanding competence assessments to include question types other than multiple-choice with support from psychometricians at HumRRO

The [full report of HumRRO's findings](#) is available on the ASWB website as of December 2023.

Social Work Workforce Coalition and Social Work Census

The Social Work Workforce Coalition, a diverse group of social work organizations brought together by the Association of Social Work Boards, will launch the [Social Work Census](#) in March 2024. The census will serve as a comprehensive workforce study that will create the most inclusive picture to date of who today's social workers are. It will gather important demographic information about social workers for use by researchers and others to help them understand the value of professional practice, build awareness of workforce issues, and suggest the best solutions for workforce challenges.

The Social Work Census will also include an analysis of the practice of social work, a process ASWB undertakes regularly to keep its competence assessments current and relevant. Because of its greater outreach through the promotional efforts of the coalition, this reenvisioned practice analysis promises to provide a better, more inclusive understanding of the knowledge, skills, and abilities that social workers need to perform competently and safely at entry to practice. That enhanced information will guide the content of the next iteration of social work licensing assessment measures, slated for 2026.

Research Initiatives

In September 2023, ASWB announced [the selection and funding of three research proposals](#) on social work licensure and regulation. Research results will promote the profession's understanding of — and response to — timely, critical questions around what it means to be a social work professional. ASWB's [Regulatory Research Committee](#) selected three research groups — reflecting diverse national leadership and expertise — to receive a total of nearly \$400,000. The funded projects will focus on understanding exam pass rates and their implications, regulatory rules as well as their effects on public safety and social workers' earnings, and long-term impacts of licensure changes on the workforce.

Upon completion of these studies, researchers will publish their findings to support understanding across the profession. This growing body of research will inform important systems changes that will benefit not only the profession but also the people and communities whom social workers serve.

New Test Vendor

Additionally, in January 2024, [PSI began administering the ASWB licensing exam program](#). ASWB and PSI will pursue initiatives designed to support candidates' paths to licensure, including the development of a scholarship fund for repeat test-takers. The two organizations have each pledged to contribute to a fund for future outreach to and support for test-takers, particularly those from historically marginalized communities.

Continued publication of disaggregated pass rate data

In summer 2024, ASWB will continue publication of its analysis of exam pass rate data, to be presented alongside further independent research designed to provide additional insights to the regulatory community and the broader profession. ASWB researchers are working on a conceptual framework and research methodology to be submitted for peer review, which aim to generate empirical data to help in understanding pass rate differences, and societal factors contributing to the disparities.

A Collective Call to Action

ASWB appreciates the opportunity to have representatives serving as members of the Maryland Social Work Licensure Workgroup. We recognize that addressing the challenges facing our profession requires a concerted collaborative effort. It is critically important that the educational community, regulators, social work professionals, and other stakeholders work together to build a brighter future for our field. We look forward to continuing our work alongside our fellow Workgroup members throughout 2024, and we thank the Chair for the opportunity to submit this report for the record.



NATASHA M. DARTIGUE
PUBLIC DEFENDER

KEITH LOTRIDGE
DEPUTY PUBLIC DEFENDER

TERRI COLLINS-GREEN
DIRECTOR, SOCIAL WORK DIVISION

January 9, 2024

To: Honorable Senator Mary Washington
Honorable Delegate Robbyn T. Lewis

From: Terri Collins-Green, LCSW-C
Director of Social Work
Maryland Office of the Public Defender

Honorables,

Thank you for your due diligence in addressing the concerns of many MSWs and Social Workers for the state of Maryland. I want to take this time to bring two issues to the attention and consideration of this committee regarding these below identified duties of the committee:

Concern #1 Provision of clinical supervision

- **Determine whether to establish a temporary license for applicants for a bachelor social worker license or a master social worker license who, except for passing an examination required under Title 19, Subtitle 3 of the Health Occupations Article, meet the education and experience requirements for a license to practice bachelor social work or master social work under Title 19 of the Health Occupations Article.**
- **Determine how supervision may be provided to bachelor social worker licensees and master social worker licensees at no cost to the licensees.**

These provisions of the workgroup require the sole responsibility for "supervision" to fall to Board Approved Clinical Supervisors. Is the expectation that "temporary licensees" would be supervised by Board Approved Clinical Supervisors? If so, then this adds a third group of social workers who would require supervision.

Please consider that becoming a Board Approved Clinical Social Work Supervisor is voluntary. And yet, there are LCSW-Cs who take on this role for profit. As the Director of Social Work for the Maryland Office of the Public Defender, I require that every Social Work Supervisor on staff is a Board Approved Clinical Supervisor. We currently have five supervisors including myself, the Regional Manager, and three Social Work Supervisors. Additionally, we have 10 LCSW-Cs who are all Board Approved Clinical Supervisors. Those 10 LCSWs carry regular caseloads, and do not have the capacity nor the job responsible to provide clinical supervision. This secondary group serves as "emergency clinical supervisors" only. Other state agencies such as

DHR and many non-profit agencies, do not have a requirement that Social work supervisors be Board Approved Clinical supervisors. In canvassing during interviews, we ask applicants what their clinical supervision experience is/has been with mixed reports of: 1) LMSWs reported they must pay for outside supervision, 2) no consistent supervision, etc.

I am asking this workgroup to consider the additional responsibilities taken on by LCSW-Cs who in addition to their jobs, volunteer to become Board Approved Clinical Supervisors for LMSWs, thus taking on additional work for which they are not compensated for. Additionally, those LCSW-Cs who desire to become a Board Approved Clinical Supervisor are required to take a 12 hour supervision course, and must incur that cost as well as the biannual cost of the required 3 hours CEU training. One cost example are the supervision courses provided by UMSSW, the 12 hour training cost is \$260, and the 3 hour biannual training cost is \$70.

If the above provisions are enacted, I suggest this committee consider the collateral impact on Board Approved Clinical Supervisors. Does the workgroup know how many Board Approved Clinical Supervisors there are? What is the percentage of Board Approved Clinical Supervisors to LMSWs who require supervision? What consideration will there be if/when the Board Approved Clinical Supervisors need to take on multiple supervisees at the same time, and complete their duly assigned work duties because there are many more LCSW-Cs who are not Board Approved Clinical Supervisors but who are Social Work Supervisors on their jobs?

Concern #2 Consistency, fairness and timeliness of approval of Advanced licensure applications

- **Identifying barriers in addition to the examination that present challenges to licensure in the State**

During 2023, on my staff of LMSWs there were three different incidents with three different LMSWs for the approval process which caused significant delays, each seemed to be targeted because in all three incidents of the challenged applications, the LMSWs had non-anglicized first names, while the corresponding accepted applications those LMSWs had anglicized names:

- **Incident #1/January 2023** - submitted application same time as colleague with exact same job and same resume. LMSW 1 application was rejected based on resume not meeting criteria, while LMSW 2 application was approved immediately. I was forced to intervene on behalf of LMSW 1 because I could attest to the fact that both LMSW 1 and 2 had been hired at the same time, immediately upon graduation, had been doing the exact same job, and had the exact same resumes. I had to make several phone calls between January and May, to the Board ED who was finally able to get the LMSW 1 application approved. There was never any explanation or apology to LMSW 1 for the 6 month delay. This felt retaliatory to LMSW 1, as she had called the Board to complain and demand an explanation.

- **Incident #2/May 2023** - submitted application challenged because I had been her clinical supervisor, and I am the appointing authority for MOPD-Social Work Division. LMSW 1 approval was delayed as she was told by the Board they needed to confirm this was not a conflict of interest. LMSW 2 had the same situation with my signatures with no challenge and approved immediately. LMSW 1 approval after 2-3 month delay in June/July 2023
- **Incident #3/November 2023** - submitted application challenged due to below listed items in italics. The supervisee lost supervision documentation due to an agency ransomware attack, and the supervisor was unable to verify those hours. The Board's immediate assertion was one of condemnation not inquiry. And our agency has a consistent track record in advancing the careers of our social work staff. Since 2020, the MOPD-Social Work Division has been successful in the advancement of twelve social workers to LCSW-Cs, and in 2023, we had 4 LMSWs receive their Advanced licensure. The LMSW's application was approved on January 5th.

*The Director of Licensing has requested **that you and your supervisors:***

(1) provide a detailed explanation of the supervision process and protocol at State of Maryland Office of the Public Defender and,

(2) why the supervisee/supervisor were unable to meet the regulated standards.

I appreciate that the Maryland Board of Social Examiners has a responsibility to protect the citizens of Maryland, and has the authority to enforce the standards outlined in both the Health Occupations Article, Title 19, Annotated Code of Maryland and COMAR 10.42.01—10.42.09. However, the Board of Social Work Examiners must also be held accountable for operating with a level of timeliness, accountability, transparency, professionalism and respect to those social workers who are serving the citizens of Maryland that they are charged with protecting.

Finally, I want to point out that the state of Maryland nationally one of the highest license renewal rates because of legislation passed nearly a decade ago that made licensing boards financially independent from the state budget. Those costs have been passed onto us, the social workers of Maryland. I ask that this workgroup consider that any added responsibilities in relation to the approval of other types of licensure could potentially cause an increase in renewal rates.

Thank you for your time and consideration in this important work.

Terri Collins-Green, LCSW-C

Director of Social Work

Maryland Office of the Public Defender

terri.green@maryland.gov

SWEAR

Social Workers for Equity and Anti-Racism

Given that:

- a. ASWB exams have no proof that they correlate with public protection or competent practice
- b. ASWB exams show direct harm to already disenfranchised groups
- c. Social work has a robust supervision process

We support any process that reduces or eliminates ASWB influence from our state & social work profession.

Please find our response to your workgroup mandates below.

1. Whether to continue use of the ASWB exam for the LBSW and LMSW

- a. We recommend elimination of the LBSW and LMSW exams. Maryland has strict rules about supervision at the LBSW and LMSW levels until someone has applied for and received an independent practice LBSW or LMSW. This is a more accurate method to assess social workers than an ASWB exam as we are a person-centered profession; people are not standardized.
- b. Illinois removed its masters' level exam requirement and in two years has [doubled](#) its Masters social workers without any increase in complaints to their board. Many other states, including California and Florida, have not used the Bachelor or Masters level exams as a barrier for social work practice for years and have not seen any public safety issues.

2. Alternative Pathways to Social Work Licensure

- a. A moratorium on all exams for 3-5 years so the issue can be studied in Maryland. This is similar to the "grandfathering" process that happened in the 1990's.
- b. Illinois recently created an alternate process for its [clinical](#) license, and we believe it is a reasonable alternative. After social workers finish their supervised practice, they take the ASWB exam. If they fail, they can do additional supervised practice (doubling their supervised practice time) and then they will be able to get their license. This also gives the benefit of future research being able to show whether tested or exempted social workers have differences in their board sanction rates.
- c. An 8-point waiver, so if someone fails the clinical exam by 8 points or fewer, they can still get the appropriate license. This is based on ASWB themselves saying they remove "less than 5%" of scored exam items due to DIF (a statistical analysis of items, too high of a DIF analysis means the item is biased). They do not go back and rescore the tests of people who had removed test items, so this gives the wiggle room necessitated by their own DIF analysis. This waiver should be higher for people who take the test with ASL interpretation due to ASWB policies that make interpretation quality too variable.
- d. If we believe that the licensure process protects the public, having more BSWs and MSWs obtaining their licenses would *protect* the public.

3. ASWB testing recommendations AND 4. Recommendations to consider other testing vendors

- a. We will never have a testing recommendation that includes ASWB, as they have not shown themselves to be team players in this endeavor. This workgroup requested an ASWB expert on the creation of the tests, but they have declined this request. They have yet to take any accountability for the bias present in their exams, offensively parroting "stereotype threat" and "upstream factors" as the reasons for differing pass rates. Finally, they have a clear financial interest in preserving the exams; their assets have increased [from about \\$26 million to over \\$40 million](#) since 2017. [Public financial reports](#) show that in 2022, they were sitting on almost \$44 million of total assets. Exam revenues are, by far, their biggest revenue source.
- b. [No licensing test](#) for any mental health profession shows a correlation with safe and ethical practice, and ASWB does not follow all standards for high-stakes testing. Ultimately, standardized tests are done because we as a society like standardized tests and it seems like it adds "legitimacy." The National Association of Black Social Workers (NABSW) foreshadowed this in [1983](#).
- c. One could pass these exams despite failing the "public protection" sections of ethics and crisis intervention.
- d. As members of the ASWB, the MD-BSWE is inherently biased towards keeping the exams in place.
- e. If tests are determined to be necessary despite all evidence that they are not useful and cause harm, Maryland should develop a jurisprudence exam for our state solely based on objective laws and regulations. If this test is in development one day, ASWB exams are not an acceptable alternative while it is developed.



Attention: Ms. Bailey

On behalf of Coppin State University Social Work Department, the following recommendations regarding establishing a temporary license for those who meet the LBSW/LMSW requirements but have not passed the ASWB exam are listed below. Below are a few practical solutions to allowing these individuals to begin practicing under supervision while they work towards passing the exam.

- A license does not automatically guarantee that individuals are qualified or have enough experience to work with and address the needs of individuals, families, and communities in need of specialized services. A temporary license can allow individuals who are in the process of completing their clinical supervision requirements to gain experience under the supervision of a licensed social worker. This can help them further develop their skills and provide quality services to clients.
- After COVID, social workers, counselors, and other helping professionals saw an increase in the number of individuals in need of mental health treatment and other resources. A temporary license can expand the pool of qualified social workers available to provide services to individuals and families in need. This can help to reduce wait times and ensure that clients receive timely and effective support while addressing workforce shortages of trained and qualified social workers.
- We can encourage ongoing professional development and growth within the social work field. This can help to ensure that social workers are continuously improving their skills and knowledge to better serve their clients.
- Finally, this exam creates stress for students obtaining a degree in social work. They often feel they cannot use the degree in the field of social work unless they have a license. In addition, failing the exam can prevent or delay future social workers from advancing in their careers. The content can be overwhelming leaving students feeling overwhelmed and having high levels of anxiety.

Sincerely

Dr. Paulette Williams-Tillery

To: Recommendations on Testing Subcommittee
Date: February 19, 2024
Subject: Executive Summary from Professional Social Work Licensure Exam Recommendation Survey

MEMO

Survey results from The Center for Restorative Change, including feedback from students, staff, and community partners, on their recommendations for the professional social work licensure exam

The survey responses regarding recommendations for the social work licensure exam indicate a widespread desire to reconsider the ASWB exam. This sentiment is fueled by concerns over the exam's intimidating nature and its low pass rates among potential practitioners of color. Respondents propose removing the testing requirement entirely and instead relying on application submission, completion of clinical supervision hours, and continuing education units (CEUs) for licensure. Some respondents criticize standardized testing as inherently racist and suggest implementing 1-on-1 supervision with experienced professionals as an alternative.

Furthermore, respondents suggest diversifying the group responsible for creating the test, discontinuing the ASWB exam for the LBSW and LMSW levels, and exploring alternative pathways to licensure, such as considering work history/experience or implementing a "grandfathering" system. Some argue that a master's degree should be sufficient for practicing at a graduate level, raising questions about the necessity of the LMSW designation. Suggestions for improving the exam include reevaluating it to reduce bias and providing free testing resources like Pocket Prep. Overall, respondents emphasize the need to address racial disparities, support social workers of color, and ensure that licensure processes do not create undue burdens.

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**Appendix H:
Correspondence from ASWB**



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December 2, 2024

(Via email only ana.lazarides@maryland.gov)
Karla Abney, MSW, MSN, LMSW
Chair, Maryland Workgroup on Social Work Licensure
c/o Office of Healthcare Workforce Development
Maryland Department of Health
201 West Preston Street
Baltimore, MD 21201

Dear Chair Abney,

Upon submission of my comments to the final draft of the Interim Report of the Maryland Workgroup for Social Work Licensure (Workgroup), I received an email asking me to submit a letter identifying my thoughts and concerns over the Workgroup and pending report. That email noted that my letter would be attached to the Final Report and be a part of the record. Please accept this submitted letter on behalf of the Association of Social Work Boards (ASWB) and as an appointed member of the Workgroup. It is noted that the report has been finalized and will be referred to as "Report" with reference to interim report where relevant.

ASWB

ASWB is a not-for-profit membership organization recognized as exempt from federal taxation under section 501(C)(3) of the Internal Revenue Code. ASWB membership (Member Boards) consists solely of government boards/agencies that are legislatively created and delegated with the authority to regulate social workers and social work practices consistent with the legislative intent of public protection. The Maryland Board of Social Work Examiners (Maryland Board) has been a member of the Board of ASWB for decades. Member Boards, including the Maryland Board, have representation at all ASWB meetings, benefit from education programming, and select delegates to vote on matters to ensure that government perspectives prevail. The Maryland Board is currently represented on the ASWB Board of Directors through election by the membership.

The 501(C)(3) recognition is based on the fact that ASWB provides programs and services to its member boards that lessen burdens on state government, thereby increasing the effectiveness and efficiency of government regulation. In addition to many additional programs and services, ASWB develops, administers, scores, and maintains a uniform examination program used by member boards. The ASWB examination program is an objective measure validated and legally defensible as a determiner of minimum competence following psychometric principles and industry standards.

COMMENT

Thank you for the opportunity to comment on the interim report. I elect to respond via email (submitted previously) and in letter form as my comments do not fit into the template format provided to Workgroup members. I assume these comments and suggestions will still be considered. Due to the limited period to review, digest, and provide comments, I am compelled to express my concerns in an abbreviated format addressing procedure and content. The limited review time prohibits any meaningful editorial suggestions. Readers will notice how it addresses more than the language contained in the Report. The Report should be a roadmap for the recommendations. Unfortunately, the process followed by the Workgroup was anything but a leisurely drive.

I acknowledge the importance of the issues facing the Workgroup and the need for constructive dialogue. However, all aspects and perspectives of these issues must be reviewed to address complex issues and evaluate informed recommendations. The Workgroup, perhaps driven by the legislation's wording, focused on eliminating the examination program. As a result, it has been recommended that an objective, validated measure of minimum competence be eliminated and replaced with subjective measures in education and supervision, a recommendation that seemed predestined. This approach is misplaced as it fails to establish criteria for licensure, acknowledge workforce issues and shortages, or consider exemptions from government licensure compromising consumer and public protection. Indeed, as noted in the name, The Maryland Board of Social Work Examiners is delegated to examine applicants. The examinations are within the purview of the Maryland Board as a member of ASWB. Education and supervision, which have been suggested as appropriate replacements for examination, fall woefully short of ensuring practitioners meet minimal, objective standards of the profession.

Overall, the Workgroup has not been welcoming to contrary opinions, nor has it approached its work unbiasedly. Instead, it was a one-sided, predetermined process that minimized any voice that supported minimum competence examinations or even questioned the immediate conclusions held by Workgroup members. Illustrating this bias, after the first Workgroup meeting, a letter from the Chair was disseminated to all Workgroup members that asked that the two ASWB appointees (myself and Ms. Cara Sanner) be removed from the Workgroup. Despite this letter being sent to all members, the Workgroup never discussed the matter, but the chilling effect on true discourse was apparent for the remainder of the process.

Further challenges to the Workgroup's administration resulted from delays in convening the Workgroup that condensed the meeting timeline. SB 871 of 2023 required a preliminary report by September 1, 2023, and an interim report by December 1, 2023. However, the first Workgroup meeting occurred on October 24, 2023, with subsequent biweekly meetings through January 30. Meetings generally focused on informational sessions with briefings given on various topics, which, although relevant, consumed meeting time. Importantly, no opportunity was provided for Workgroup members to discuss the presented information and consider its charges' relevance. The Workgroup was presented with its mandate at the December 19th meeting, but members could not formally discuss its charges until January 9, 2024. Subgroups were assigned on January 30 and tasked with providing preliminary recommendations by February 16. Unexpectedly, the subgroups were disbanded without prior notice to the Workgroup in late February. The Workgroup did not meet during the Summer, limiting the time to fulfill its mandate. Meetings did not start again until September 25. One meeting was held in October, two meetings were held in November, and it was announced that the Workgroup would be given the weekend of November 22 to review and provide comments on the Final Report by November 25. This exemplifies the lack of planning and execution of the Workgroup in a manner necessary to conduct this critical work.

I respectfully request that this letter be attached to and made a part of the Report, or in the alternative, a dissenting report be accepted by the committee as an attachment to the Final Report.

Providing a Final Draft Interim Report on a Friday (November 22, 2024) before a holiday week and expecting substantive and thorough evaluation by each Workgroup Member by Monday (November 25, 2024) is consistent with the overall efforts to discourage genuine collaboration. The timing is unfair to the Workgroup Members and significantly undermines the serious nature of the recommendations in the Report. The expectation that all comments and suggestions of a Workgroup of this size will be synthesized for submission by December 1, 2024, is unreasonable. This timeframe and approach foreshadow the likelihood of dissenting comments or suggested edits being included in this Report is negligible.

The Report fails to capture the abbreviated nature of decision-making, leading to recommendations. While the Workgroup met numerous times, little, if any, was spent discussing the charge's focal point, which was evaluating the purpose and necessity of minimum competence examinations. Indeed, the legislation used language promoting the elimination of the BSW and MSW examinations; the Workgroup failed to assess the role that such examinations play in the licensure process and, ultimately, public protection. Nothing in the statute's guiding language precluded this logical first step; the failure of the Workgroup to engage, even minimally in such an evaluation, calls into question the final recommendations.

At the January 30, 2024, Workgroup meeting, the validity and psychometrics of minimum competence examinations were presented by representatives from both ASWB and the National Council of State Boards of Nursing (NCSBN)-the equivalent of ASWB in nursing. The presenters displayed a wealth of knowledge on minimum competence examinations' complexities and validation processes. Not surprisingly, the Workgroup members had virtually no questions for the presenters, seemingly committed to ending the testing process. Furthermore, the Report summarily references the presenters without any editorial additions to identify the rigorous process used to develop, administer, score, and maintain a defensible assessment mechanism that objectively measures knowledge, skills, and abilities. Also absent were any references to the diverse volunteers who dedicated countless hours to the survey instrument, identification of content areas, item writing and editing, statistical analysis of performance, and cut score conclusions. Conversely, the Report contains numerous references to other presenters at subsequent meetings and editorial notations of what was presented and its importance. These additional presenters made blanket statements without factual support. On the other hand, the ASWB and NCSBN representatives who spoke to the validity and defensibility of minimum competence examinations, and presented with legal and factual support and references to other professions, were not included in the Report.

The Report neglects to mention that government licensing boards of virtually all professions (law, medicine, etc.) use competence examinations as one criterion for licensure eligibility. The reasons are apparent as they provide a validated, legally defensible objective measure that allows the government to justify its eligibility decisions. More specifically, the process used by ASWB and other organizations involves survey instruments, identification and development of content areas, item development, pretesting, item performance statistics, cut score analysis, and evolution of these processes. Validation processes never stop but are ongoing continuously. ASWB involves hundreds of diverse volunteers in these processes, and these are identified in the annual Examination Yearbook available via the ASWB website. Fundamental due process mandates that regulatory boards undertake a fair process in granting and, when necessary, denying licensure applications. In addition, minimum competence examinations play an important but distinct role from an education component.

The recommendations' absence of virtually any reference to protecting the public and consumers of social work services is equally concerning. The Workgroup ignored the very nature of government licensure of a practitioner and what constitutes a profession in need of regulation. ASWB understands the importance of recognizing where inequities may surface and adjusting evaluations to eliminate bias. However, ignoring the very essence of why government regulations exist is short-sighted and unjustified by the Report's narrative. The Report overlooks a new set of biases that will arrive with a new process or establish safeguards to minimize subjectivity, which can harm the profession.

The absence of any reference to the consequences of these recommendations is a glaring omission. Public protection, mobility, portability, licensure transfer, endorsement, licensure compacts, and the likelihood of isolation of Maryland licensed social workers are problematic for the profession.

The next global issue is the use and process of populating Workgroup subgroups. Although I requested to be on the academic/education subgroup, I was told that such a subgroup would only comprise those in academia. Thus, the subgroup was an echo chamber of academics that did not reflect on the notion that the preparedness of test takers as such would turn the attention on themselves. A review of exam performance by educational programs would reveal relevant data, and legislators are encouraged to do so. Further, challenging issues, such as the potential for education to be either an unnecessary barrier to licensure or a significant contributing factor to minimum competence exam performance by applicants, would be prudent. Academicians should have been encouraged to address the arbitrary nature of student performance, academic exam development and scoring, enrollment, and graduation, all at a significant time and expenses, much of it on borrowed monies. If these issues were discussed, it was not noted in the Report nor offered to the Workgroup for debate and discussion.

The use of an outside consultant to draft the Report is concerning. It is unclear why an outside private consulting firm is needed to draft the Report or how a Report of this significance can be drafted by a group that did not attend the Workgroup meetings. This process sheds additional light on the unfairness of the short review time by Workgroup members. The Report refers to the consulting firm engaging in pre and post-workgroup meetings. It is unclear who was present at those meetings, the agendas, how long they lasted, and the applicability of open meeting laws. Multiple requests to meet with the Chair to discuss the Workgroup processes were denied, citing the open meetings laws that either did not apply or were ignored during the drafting process.

Finally, conspicuously absent from the Report are any cautionary statements or references to counter positions to eliminate the use of minimum competence examinations. The Report is written to support the conclusions foregone from the outset of the Workgroup. There is no reference to how subjective factors will be defended in the event of a denial of licensure. There is no acknowledgment of the concerns accompanying the recommendations to eliminate legally defensible assessments/examinations, which are only to be replaced by subjective determinations by education programs and postgraduate supervisors. There were no inquiries about students' admissions, retention, matriculation, and graduation from an education program. There was no curiosity about admissions standards or statistical analysis based on marginalized populations and graduation rates from the 900+ social work education programs. Senate Bill 871 not only sought a review of the examination program but asked for a review of all barriers to licensure.

Equally absent were any inquiries about the placement of gatekeeping responsibilities of a mandated government licensure in private sector education programs and individual supervisors who are not bound by any standards regarding supervisor eligibility or standards applicable to supervisee performance. Such an approach will challenge the defensibility of licensure decisions. As a reminder, ASWB is a membership organization of government entities and member boards, including the Maryland Board of Social Work Examiners, that make policy decisions.

The Workgroup was challenged to look at big-picture concepts with the details to be worked out later, but there was no consideration of the need for a process that can be defended when an application is denied. Alternatively, perhaps no applications will be denied, begging the question of why the government regulates social workers. The application and renewal processes must be defensible when the government mandates licensure as a prerequisite to lawful practice. This is especially true when denying an application for licensure or renewal. Effectively, the Workgroup recommends eliminating the only objective measure (entry-level competence examinations) and replacing them with subjective education and postgraduate supervisors. The Maryland legislature will be hard-pressed to draft statutes that delegate the essential public protection aspects of licensure and to recognize subjective decisions to dictate license eligibility. The Maryland Board will have an equally difficult time enforcing such laws.

Subgroup organization proved ineffective, lacking adequate task time and integration with the Workgroup. Subgroups are essential to any workgroup as they enable members to delve into detail to help shape and inform recommendations. Unfortunately, the workgroups were largely superficial and not relied upon in drafting the Report or the recommendations. ASWB's concerns with the subgroup process are as follows:

- a. Four subgroups were announced to the Workgroup on December 28, 2023, with leadership defining their charges, yet only one was designated to address the Workgroup's mandate.
- b. Subgroups were created in January and were asked to meet and have preliminary reports submitted by February 16, in time for the February 27th meeting of the Workgroup. The subgroups could not meet in a manner that correctly considered the charges and provided thoughtful recommendations. For instance, the Testing Barriers subgroup that Ms. Sanner participated in reported meetings where we could only speak briefly. That subgroup could only meet once to consider the initial charges in a way that permitted time for discussion. Yet the subgroup was expected to discuss and make recommendations during that meeting.
- c. Subgroups prepared written communications to document their group activity and discussion; however, these reports were not shared with the full Workgroup at the February 27th meeting. They were briefly discussed, and no written materials were presented to facilitate understanding and discussion.
- d. The lack of cross-subgroup discussion deprived the Workgroup members of broader insights and hindered collective understanding.
- e. External individuals not appointed to the Workgroup were invited to participate in subgroup activities, influencing recommendations.
- f. Some Workgroup members, including ASWB representatives, were denied subgroup participation, fostering an echo chamber effect and hindering critical thinking by limiting exposure to diverse perspectives.

- g. Subgroup meetings were again announced at the September 25th meeting of the Workgroup – after many months– with a request for recommendations in October. There was very little time to convene a meeting of any subgroups, and minimal direction was given to the groups on their charges. As reported in the October meeting, only two of the four subgroups could share information ahead of the October Workgroup meeting. The information provided to the Chair was not made available to the Workgroup in a manner that would permit participants to review the information and come back together to discuss it. Testing Barriers, the subgroup Ms. Sanner participated in, could only meet once on October 22 before the deadline to report back to the Workgroup on October 30. No information or materials were presented to the subgroups to provide direction on the purpose of the meetings. For instance, the day before the Testing barriers subgroup met in October, meeting minutes from the previous meeting still had not been shared, nor had the draft interim report. There was no further information on the goal of subgroups' meetings beyond the following: "temporary license, grandfathering provisions, the cost of supervision, alternative licensure pathways."

I realize these global issues do not provide specifics to be added/deleted/modified from the Report; however, proffering such suggestions would require more than seven days. ASWB will work efficiently to provide more specifics if the Chair permits more time.

For the record, I have left my specific comments on the Report below as it is unlikely they can or will be integrated into the final submission. Please refer to the below for comments on identified portions of the draft Report.

Turning to the specific language of the reviewed interim report (understanding that page numbers may have changed in the Final Report)

At the bottom of page 2, over onto the top of page 3, there is a reference to issuing a license to applicants once they have met all education requirements. I do not recall this being recommended. Does this recommendation suggest issuance before meeting all other licensure prerequisites? It is suggested that this reference be clarified. Indeed, those completing an educational program must apply for licensure with the Maryland Board.

In the middle of page 3 is a reference to an advanced clinical social worker. It is further referenced on page 14 using a capital "A" in the term advanced. I do not recall an "Advanced" clinical social work license in statute. Is this an appropriate term to use? Is it in the current law?

On page 6, CMAG is introduced into the Report. Please insert the date CMAG was selected to draft the Report and the number of workgroup meetings CMAG personnel attended.

Also, on page 6, the Report refers to CMAG participating in "Pre- and post-Workgroup meetings." What does this mean? How did these meetings comply with open meeting laws, and what is the rationale for excluding members of the Workgroup? Please reference all pre- and post-Workgroup meetings held with CMAG and those who attended them. Also, who were the Workgroup members invited to participate in such discussions?

On page 9, in the second paragraph, an end parenthetical is missing. Not sure where it belongs. In that same paragraph, there is a reference to jurisprudence examinations used as an equitable pathway to licensure. It should be noted and clarified that jurisprudence exams do not test KSAs or replace minimum competence exams but supplement them related to knowledge of laws. In some jurisdictions, jurisprudence exams are open book and not considered high stakes. Thus, they are not validated following the psychometric Standards.

On page 9, there is a reference to the "level" of licensure. Social work licensure is not necessarily hierarchical. It is suggested that the level be changed to category throughout the Report.

On page 9 and throughout the remainder of the Report, there is a reference to requirements for licensure that only include education and background checks. Persons seeking licensure must submit a completed application, pay applicable fees, and be of age of majority--not sure if age is in statute. It is suggested that these modifications be made in multiple places in the Report.

On page 11, "Item ii, there is a reference to "grant licensure." The word temporary should be added.

On page 12, there is a reference to "recent data." What data is that referring to?

On page 14, "the Workgroup wants to have a plan in place to re-engage with individuals who have been unsuccessful in pursuing their licensure." Is this re-engagement to be undertaken by the Workgroup or the Board? Please clarify that this responsibility belongs to the Board. Also, there are legal issues at stake here that must be explored.

On page 19, there is a reference to "experts" who presented to the Workgroup. What parameters were used to identify these presenters as experts? Were other presenters not considered experts? It is suggested that the term experts be defined and identified or removed from the Report. Additionally, on page 19 were references to the substance of what was presented, while other presenters were not afforded such an overview.

CONCLUSION:

The Workgroup failed to explore, consider, and become educated on government licensure, due process, and the need for defensible criteria in a mandated licensure process. Thus, the Report and its recommendations are severely flawed. The Workgroup made assumptions and allowed unsubstantiated conclusions to be stated and relied upon in the record. The draft Report does not accurately disclose a process that severely limited substantive discussions but merely reflects a predetermined result. ASWB would be remiss if it did not caution readers of the Report that the recommendations, which have not been adequately vetted, are a replacement for an objective process, not an improvement. Ultimately, minimal competency is compromised without an objective assessment of entry practitioners.

Respectfully,



Dale Atkinson, Esq.