

## Workgroup for Social Work Licensure Requirements

**Date:** February 26, 2025 **Time:** 10:00 am - 12:00 pm

**Video call link:** <https://meet.google.com/rso-bhjm-uqe>

Or dial: (US) +1 347-762-8966 PIN: 856 535 732#

### **Agenda**

- I. Administrative Updates -**
  - A. Roll Call
  - B. Vote on December and January Meeting Minutes
- II. Discussion**
  - A. House Bill 1521-State Board of Social Work Examiners - Membership and Examination Requirements
    - 1. 2/20/2025-First Reading House Rules and Executive Nominations
  - B. Subgroup Recommendations
    - 1. Policy
    - 2. Testing Barriers
    - 3. Recommendations on Testing
    - 4. Universities/Schools/Programs of Social Work
  - C. Alternative Pathway survey results
- III. Public Comment**
- IV. Closing and Next Steps**
  - A. Subgroups are to meet before the next Workgroup meeting on March 26, 2025.
- V. Upcoming Meeting Schedule**
  - A. March 26, 2025
  - B. April 30, 2025
  - C. May 28, 2025
  - D. June 25, 2025

# HOUSE BILL 1521

J2

5lr3627  
CF SB 379

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By: **Delegates Woods, Alston, Martinez, and Taylor**

Introduced and read first time: February 20, 2025

Assigned to: Rules and Executive Nominations

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## A BILL ENTITLED

1 AN ACT concerning

2 **State Board of Social Work Examiners – Membership and Examination**  
3 **Requirements**

4 FOR the purpose of repealing the examination requirements for bachelor and master social  
5 worker licenses; altering the number of consumer members on the State Board of  
6 Social Work Examiners; and generally relating to the regulation of social workers.

7 BY repealing and reenacting, without amendments,  
8 Article – Health Occupations  
9 Section 19–201, 19–301(a), and 19–302(b) and (c)  
10 Annotated Code of Maryland  
11 (2021 Replacement Volume and 2024 Supplement)

12 BY repealing and reenacting, with amendments,  
13 Article – Health Occupations  
14 Section 19–202(a)(1) and (2) and 19–302(a), (d), and (e)  
15 Annotated Code of Maryland  
16 (2021 Replacement Volume and 2024 Supplement)

17 SECTION 1. BE IT ENACTED BY THE GENERAL ASSEMBLY OF MARYLAND,  
18 That the Laws of Maryland read as follows:

19 **Article – Health Occupations**

20 19–201.

21 There is a State Board of Social Work Examiners in the Department.

22 19–202.

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EXPLANATION: CAPITALS INDICATE MATTER ADDED TO EXISTING LAW.

[Brackets] indicate matter deleted from existing law.



(a) (1) The Board consists of [12] 14 members.

(2) Of the [12] 14 Board members:

(i) 10 shall be licensed social workers of whom:

1. Subject to paragraph (3) of this subsection, 1 is a licensed bachelor social worker;

2. Subject to paragraph (3) of this subsection, 1 is a licensed master social worker at the time of appointment;

3. Subject to paragraph (3) of this subsection, at least 1 is:

A. A licensed certified social worker; or

B. A licensed master social worker who is approved for independent practice;

4. Subject to paragraph (3) of this subsection, at least 4 are licensed certified social workers—clinical;

5. 1 is a licensed social worker employed by the Department of Human Services; and

6. Subject to paragraph (3) of this subsection, 1 is a licensed social worker who is:

A. Primarily engaged in social worker education at a social work program accredited by the Council on Social Work Education; and

B. Nominated from a list of names submitted by the deans and directors of the Maryland Social Work Education Programs; and

(ii) [2] 4 shall be consumer members.

19–301.

(a) Except as otherwise provided in this title, an individual shall be:

(1) Licensed by the Board before the individual may practice social work in this State while representing oneself as a social worker; or

(2) Licensed as a certified social worker—clinical before the individual may practice clinical social work in this State.

19–302.

(a) To obtain a license, an applicant shall demonstrate to the satisfaction of the Board that the applicant:

(1) Has submitted a complete written application in the form prescribed by the Board;

(2) Is at least 18 years old;

(3) Is of good moral character;

[(4) Except as otherwise provided in this title, has successfully passed an examination or examinations prescribed by the Board pertinent to the license sought;]

[(5)] (4) Has paid all applicable fees specified by the Board;

[(6)] (5) Has completed a criminal history records check in accordance with § 19–302.2 of this subtitle at the applicant’s expense; and

[(7)] (6) Has submitted to an examination if required under § 19–302.3 of this subtitle.

(b) To obtain a bachelor social worker license, an applicant shall:

(1) Meet the requirements of subsection (a) of this section; and

(2) Have received a baccalaureate degree in social work from a program that is accredited or is a candidate for accreditation by the Council on Social Work Education or an equivalent organization approved by the Council on Social Work Education.

(c) To obtain a master social worker license, an applicant shall:

(1) Meet the requirements of subsection (a) of this section; and

(2) Have received a master’s degree from a program that is accredited or is a candidate for accreditation by the Council on Social Work Education or an equivalent organization approved by the Council on Social Work Education.

(d) Except as provided in § 19–302.1 of this subtitle, to obtain a certified social worker license, on or before December 31, 2023, an applicant shall:

(1) Meet the requirements of subsection (a) of this section;

(2) Have received a master's degree from a program accredited by the Council on Social Work Education or an equivalent organization approved by the Council on Social Work Education; [and]

**(3) EXCEPT AS OTHERWISE PROVIDED IN THIS TITLE, HAVE SUCCESSFULLY PASSED AN EXAMINATION OR EXAMINATIONS PRESCRIBED BY THE BOARD PERTINENT TO THE LICENSE SOUGHT; AND**

~~[(3)]~~ (4) Provide in a form prescribed by the Board, documentation of having completed 2 years as a licensee with supervised experience of at least 3,000 hours after receiving the master's degree with a minimum of 100 hours of periodic face-to-face supervision in the practice of social work under the terms and conditions that the Board determines by regulation.

(e) Except as provided in § 19–302.1 of this subtitle, to obtain a certified social worker–clinical license, an applicant shall:

(1) Meet the requirements of subsection (a) of this section;

(2) Have received a master's degree in social work and documentation of completion of 12 academic credits in clinical course work from a program accredited by the Council on Social Work Education or an equivalent organization approved by the Council on Social Work Education, with a minimum of 6 of the 12 academic credits obtained in a master's degree program; [and]

**(3) EXCEPT AS OTHERWISE PROVIDED IN THIS TITLE, HAVE SUCCESSFULLY PASSED AN EXAMINATION OR EXAMINATIONS PRESCRIBED BY THE BOARD PERTINENT TO THE LICENSE SOUGHT; AND**

~~[(3)]~~ (4) Provide in a form prescribed by the Board, documentation of having completed 2 years as a licensee with supervised experience of at least 3,000 hours, of which 1,500 hours are in face-to-face client contact, after receiving the master's degree with a minimum of 100 hours of periodic face-to-face supervision in the assessment, formulation of a diagnostic impression, and treatment of behavioral health disorders and other conditions and the provision of psychotherapy under the terms and conditions that the Board determines by regulation.

SECTION 2. AND BE IT FURTHER ENACTED, That this Act shall take effect October 1, 2025.

# SENATE BILL 379

J2

5lr1845

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By: **Senators M. Washington, Benson, Lam, and Brooks**

Introduced and read first time: January 17, 2025

Assigned to: Education, Energy, and the Environment

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(2) Have received a master's degree from a program accredited by the Council on Social Work Education or an equivalent organization approved by the Council on Social Work Education; [and]

**(3) EXCEPT AS OTHERWISE PROVIDED IN THIS TITLE, HAVE SUCCESSFULLY PASSED AN EXAMINATION OR EXAMINATIONS PRESCRIBED BY THE BOARD PERTINENT TO THE LICENSE SOUGHT; AND**

~~[(3)]~~ (4) Provide in a form prescribed by the Board, documentation of having completed 2 years as a licensee with supervised experience of at least 3,000 hours after receiving the master's degree with a minimum of 100 hours of periodic face-to-face supervision in the practice of social work under the terms and conditions that the Board determines by regulation.

(e) Except as provided in § 19-302.1 of this subtitle, to obtain a certified social worker-clinical license, an applicant shall:

(1) Meet the requirements of subsection (a) of this section;

(2) Have received a master's degree in social work and documentation of completion of 12 academic credits in clinical course work from a program accredited by the Council on Social Work Education or an equivalent organization approved by the Council on Social Work Education, with a minimum of 6 of the 12 academic credits obtained in a master's degree program; [and]

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SECTION 2. AND BE IT FURTHER ENACTED, That this Act shall take effect October 1, 2025.

## Feb 18, 2025 | [Policy Sub Committee](#)

Attendees: Laura Torres, Philicia Ross, Karessa Proctor, Diamon Haliburton, Erin Penniston, Karen Richards

### Notes

- Introductions: Laura Torres, BHA Appointee; Philicia Ross, NAACP Representative; Karessa Proctor, NASW-MD; Erin Penniston MDH, Diamon Haliburton ODHH; Karen Richards, BSWE
- Charge before next Licensure Workgroup as a sub-committee- main goals
  - Look at Alternative Pathways logistics
  - Chair Abney would like group to find a chair
- Timeline/framework for the alternative to the LCSW-C
  - Policy Subcommittee to make suggestions to larger group
  - Whatever is brought to the larger workgroup is not definitive - we are making recommendations
    - Recommendations from subcommittee - all members do not have to be in agreement
- Question: Is the larger workgroup extending past the end of 2025?
- In looking at alternative pathways - assumption is that the exam requirement for LCSW-C would still be required
- Discussion of group around the nuance of independent status and roles of Social Workers in general
  - Many roles for social workers do not require a C - advanced clinical level
- Tease out some of the nuances of MD licenses levels and what they can do
  - Licensure is robust and there remains some confusion around independent status as an example
- Micro versus Macro level social workers - choices made by social workers at graduate level
- Comparison with other mental health professions - LGPC and LCPC - recognizing the competition in the mental health provider space
  - LGPC focuses on clinical course work - diagnosing and treating at graduate level
- Is the larger bias analysis of the licensure levels going to be done as per the original 2023 legislation?
  - That seems a charge that is larger than this subcommittee
- Group agreed in looking at these alternatives as voted on by the larger group and as recommended by BSWE:
  - 90% of folks agreed with these changes: 1. Reduce the amount of time before an individual can re-take the exam. (The current wait time in Maryland is 90 days 2. Wave fees for re-testing. 3. Individuals unsuccessful in passing the ASWB exam will only have to re-take the section(s) they did not pass (like the Certified Public Accountant Exam) -
  - Committee members agreed to flesh these recommendations out

- ASWB has exam initiatives - see link to agenda and one pager from BSWE Feb 14 Open Session for more information
  - [https://health.maryland.gov/bswe/Documents/Agenda/2025/OpenSession\\_Agenda\\_2.14.25.pdf](https://health.maryland.gov/bswe/Documents/Agenda/2025/OpenSession_Agenda_2.14.25.pdf)
- Karen expressed concern on holding up Illinois as the state to follow - concerns over disciplinary data and transparency - see link for listing of Open Session meetings of that Board
  - <https://idfpr.illinois.gov/profs/boards/swork.html>
  - <https://health.maryland.gov/bswe/Pages/Board-Meetings.aspx>
  - Maryland Board can review 10-20 complaints against social workers a month -
  - Once a social worker is sanctioned via a public order, it is posted on our webpage - please look - reminder Board's mission - protecting the public
    - <https://health.maryland.gov/bswe/Pages/PublicOrders.aspx>
- Group ended with new chair who will report back to Chair Abney – thank you again to Philicia
  - Use alternative ways of collaborating given members' other work commitments – while still also trying to hold virtual meetings

#### Action items

- Report back Chair Abney - Philicia Ross agreed to serve as chair - TY!
- Karen will send regulation clarification of Independent status and what each license level can do - recent changes to clarify independent status
- Could more be done with Independent status - in particular, in regards to non-clinical or macro social workers??
- Start with alternatives agreed upon by 90% of workgroup- BSWE suggestions - and flesh out
- Do deeper dive into other states including Illinois but also looking at others with macro license level - for example, Michigan



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***

<b>Number of people who AGREE with this Alternative Pathway</b>	<b>Number Workgroup members who DISAGREE with this Alternative Pathway</b>
10	10
<b>Comments Summary:</b>	
<ul style="list-style-type: none"> <li>• Multipole individuals spoke of the importance of ensuring that other barriers are addressed whether this or another alternative pathway is chosen.</li> <li>• Determine the number of additional hours for this alternative pathway. Potentially less that the 3000 hours required in Illinois.</li> <li>• The ASWB exam still needs to be assessed even if an alternative pathway is put into place.</li> <li>• 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.</li> <li>• Multiple people spoke of the importance of Clinical supervision requiring a more standardized approach including continuing education for supervisors.</li> </ul>	

### **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**

<b>Number of people who AGREE with this Alternative Pathway</b>	<b>Number Workgroup members who DISAGREE with this Alternative Pathway</b>
13	7
<b>Comments Summary:</b>	
<ul style="list-style-type: none"> <li>• 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.</li> <li>• Under this scenario, those who think their test taking skills are strong have access to a less time-consuming and likely less expensive pathway.</li> <li>• 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.</li> <li>• 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 &amp; profession.</li> <li>• I prefer this option, ASWB is harmful to those taking the exam and does not</li> </ul>	



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***

<b>Number of people who AGREE with this Alternative Pathway</b>	<b>Number Workgroup members who DISAGREE with this Alternative Pathway</b>
8	12
<b>Comments Summary:</b>	
<ul style="list-style-type: none"> <li>• The overwhelming feedback on path that Texas has taken is that there is not enough information to chose this pathway.</li> <li>• 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.</li> <li>• Multiple people stated that whatever process is chosen, it should be well researched and should include more than just the exam.</li> <li>• 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.</li> <li>• Multiple individuals spoke about various education models including short 4-10 week courses,</li> </ul>	

### **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***

<b>Number of people who AGREE with this Alternative Pathway</b>	<b>Number Workgroup members who DISAGREE with this Alternative Pathway</b>
12	8
<b>Comments Summary:</b>	
<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Additional people spoke of the need for addressing the staff needs of the BSWE to fulfill the requirements of any of the pathways chosen.</li> <li>• Many individuals welcome the idea of developing a new, fair, and equitable process. Also individuals spoke of the importance of experience over the exam.</li> </ul>	

**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***

<b>Number of people who AGREE with this Alternative Pathway</b>	<b>Number Workgroup members who DISAGREE with this Alternative Pathway</b>
11	9
<b>Comments Summary:</b>	
<ul style="list-style-type: none"> <li>• Most of the comments related to this pathway were reiterating their agreement of this pathway.</li> <li>• Many individuals spoke of the importance that the jurisprudence exam should be focused on social work ethics and the laws here in Maryland.</li> <li>• Some individuals stated the importance of coupling a jurisprudence exam with additional supervision if chosen as an alternative pathway.</li> <li>• It was stated that a jurisprudence exam may remove the bias that can be found</li> </ul>	





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*

<b>Number of people who AGREE with this recommendation</b>	<b>Number Workgroup members who DISAGREE with this recommendation</b>
18	2
<b>Comments Summary:</b>	
<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• The time frame to retake the exam should be reduced from 90 days to 30 days.</li> <li>• ASWB already administers a process to waive the 90-day wait period.</li> <li>• 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.</li> </ul>	

**Change #2:**

Wave fees for re-testing.

*Workgroup Survey Results*

<b>Number of people who AGREE with this recommendation</b>	<b>Number Workgroup members who DISAGREE with this recommendation</b>
19	1
<b>Comments Summary:</b>	
<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• The Maryland licensing board first needs to guide this decision to understand</li> </ul>	



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 <b>AGREE</b> with this recommendation	Number Workgroup members who <b>DISAGREE</b> with this recommendation
19	1
<b>Comments Summary:</b>	
<ul style="list-style-type: none"> <li>• 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.</li> <li>• Free study materials to assist in retaking the exam should be provided and there should not be an additional cost.</li> <li>• If there is an exam requirement I agree with only retaking the section that was failed</li> <li>• 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.</li> <li>• 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.</li> </ul>	