

Date: December 3, 2025

RE: Final Summary of the Workgroup on Social Work Requirements for Licensure

Dear Workgroup on Social Worker Requirements for Licensure Members,

Senate Bill 871 (SB 871)/Chapter 228 (2023) established the Workgroup on Social Worker Requirements for Licensure (Workgroup) and required the Maryland Department of Health (MDH) to staff the Workgroup, which submitted its final report to the General Assembly in December, 2024, in accordance with Article-State Government, §2-1257, Annotated Code of Maryland. The Workgroup's sunset date is June 30, 2025.

Following the submission of the Workgroup's final report, the Workgroup continued to meet and discuss matters that warranted further exploration. As Chair of the Workgroup, I am issuing this Final Summary of the activities and recommendations covered post mandated final report period from January to June, 2025.

The recommendations in this report reflect the opinions of the Workgroup members, and not of the Maryland Department of Health. This final summary was not voted on by the membership of the Workgroup, but recommendations were discussed during our meetings.

It has been my honor to serve as Chair of the Workgroup on Social Worker Requirements for Licensure, and I am pleased to provide this final summary as a culmination of this work.

If you have any questions or comments concerning the report, please contact Kimberly Hiner, Director of the Office of Population Health Improvement at Kimberly.Hiner@maryland.gov.

Sincerely,



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

cc:

Kimberly Hiner, MPH, Director, Office of Population Health Improvement

**Workgroup on Social Work Requirements for Licensure -
Final Summary**

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Background

Senate Bill 871 (SB 871)/Chapter 228 (2023) established the Workgroup on Social Worker Requirements for Licensure (Workgroup) and mandated the Workgroup submit a report on its findings and recommendations to the General Assembly.¹ The law additionally required the Workgroup to submit a preliminary report on its findings and recommendations by September 30, 2023, and an interim report on December 1, 2023.² It also asked for a timeline for phasing in any determinations made pursuant to the findings of the preliminary report, along with an outline and timeline for conducting a study under Title 19 of the Health Occupations Article. SB 871 set the termination date of the Workgroup to June 30, 2025.

The workgroup was tasked to determine:

- (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;
- (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;
- (iii) How supervision may be provided to bachelor social worker licensees and master social worker licensees at no cost to the licensees;
- (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;
- (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.

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.

¹ [Senate Bill 871 \(SB 871\)/Chapter 228 \(2023\)](#)

² [Preliminary Report on the Workgroup on Social Worker Requirements for Licensure](#)

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 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.

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.³

The workgroup was established on April 24, 2023. Due to an extended workgroup appointment process, the first meeting on October 25, 2023. The extended appointment process also caused delays in submission of Workgroup deliverables. The Workgroup submitted to the General Assembly, a

³ <https://health.maryland.gov/workgroup-swrl/Pages/default.aspx>

Preliminary Report initially scheduled for submission on or before September 1, 2023, was submitted on January 31, 2024, an interim report⁴ scheduled for submission on December 1, 2023, was submitted on May 31, 2024, and a final report⁵ scheduled for submission on or before July 1, 2024 was submitted on December 1, 2024. The Workgroup's final recommendations are summarized in this final summary report.

The Workgroup met a total of twenty-two times, beginning in October, 2023, through June 30, 2025. Business conducted at these meetings included a review of statutory mandates, formation of operational processes, and setting up priorities among others. There were briefings to the membership of the Workgroup on topics such as the current licensing process in Maryland and surrounding jurisdictions, other professions exams and licensing processes, the Association of Social Work Boards (ASWB) exams, and other presentations from members of the Workgroup. In part, these activities and members' deliberations informed the findings and recommendations in both the interim and final reports.

Since the final report was submitted to the General Assembly, the Workgroup has met six times to continue its work on the various topics handled during the final reports. The findings and recommendations in this final summary are informed by the activities undertaken during the period from January to June 30, 2025, where the Workgroup engaged with various topics pertaining to social worker licensure in the state.

Workgroup Activities January, 2025 - June, 2025 (June 30, 2025 Sunset Date)

January 29, 2025 Workgroup Meeting: The Workgroup meeting discussion focused on Senate Bill 379 which would repeal examination requirements for LMSW and BSW graduates with a hearing scheduled for February 4th. It further discussed the reorganization of subgroups to better develop alternative pathways to licensure, and concerns regarding the Maryland Board of Social Work Examiners' planned survey of licensed Social Workers about licensing exams, including methodology and community representation issues. The discussion also focused on appropriate terminology when referring to the ASWB exam and accessibility needs for the deaf and hard-of-hearing community in alternative licensing pathways.

February 26, 2025 Workgroup Meeting: The Workgroup meeting discussion focused on legislative updates regarding Senate Bill 379. The discussion also focused on subgroup reports including the Policy Subgroup's exploration of independent licensure pathways, ASWB exam modifications such as reduced waiting periods and fee waivers, and alternative licensure models from Illinois and Minnesota, which received majority support in a survey of Workgroup members. The discussion additionally focused on defining "harm" in relation to licensing barriers, with members identifying financial, emotional, cultural, and systemic impacts, and supervision requirements including Maryland's current 18-month requirement and continuing education needs for board-approved supervisors. It was discussed and agreed that alternative terminology for the use of the term "harm" by the Workgroup could be "negatively impacted," however members of the Workgroup were free to use the terminology that best fit their experience.

March 26, 2025 Workgroup Meeting: The Workgroup meeting discussion focused on legislative updates. The discussion also focused on subgroup reports including the Policy Subgroup's exploration of

⁴ [Workgroup on Social Worker Requirements for Licensure Interim Report](#)

⁵ [Workgroup for Social Work Requirement for Licensure Final Report](#)

alternative supervision options for LMSWs in clinical tracks and macro-level social work, addressing financial barriers when board-approved supervisors cannot be found, and developing mechanisms to identify ASL-proficient supervisors for Maryland's 135 deaf or hard-of-hearing social workers. The discussion additionally focused on the Testing Accommodations Subgroup concerns regarding ASWB interpreter qualifications and the need for interpreters with social work terminology backgrounds, and Universities, Schools, and Programs Subgroup examination of how schools prepare students for licensure exams and their supervisory roles, with future meetings scheduled through June 2025 to develop specific alternative pathway recommendations.

April 30, 2025 Workgroup Meeting: The Workgroup meeting discussion focused on a presentation from the Board of Social Work Examiners regarding survey results from 468 licensed social workers. The discussion also focused on significant concerns raised by multiple members regarding the survey's methodology, potential bias, leading language, and lack of inclusivity for marginalized groups, with particular criticism of the sampling approach for deaf and hard-of-hearing social workers and absence of statistical significance data. The discussion additionally focused on Senator Washington's legislative efforts including bills for temporary licensure and workgroup establishment that faced opposition from ASWB lobbyists and were ultimately withdrawn due to rejected amendments. Public comments highlighted survey bias concerns, grassroots advocacy efforts, and licensing process challenges including confusing ASWB exam changes and testing appointment backlogs.

May 28, 2025 Workgroup Meeting: The Workgroup meeting discussion focused on subgroup reports regarding alternative licensure pathways, including the Deans and Directors Subgroup's consensus that MSW education provides necessary skills for entry-level practice rendering the exam unnecessary, and support for advanced-level exams only if ASWB revised them. The discussion also focused on the Policy Subgroup's clarification of supervision requirements and independent status for LMSWs and LBSWs, recommendations for improved outreach and communication about the licensure process, and addressing challenges for deaf and hard-of-hearing social workers in finding ASL-proficient board-approved supervisors. The discussion additionally focused on the Pathways to Licensure Subgroup's recommendations including removing the 90-day retake limit, addressing retesting costs, and concerns about ASWB exam changes implemented with short notice and lack of documented supporting studies, with members questioning the Board's awareness of these changes and their impact on Maryland social workers.

June 28, 2025 Workgroup Meeting: The final Workgroup meeting focused on concerns from the Workgroup regarding the ASWB licensing exam and explored alternative pathways to licensure. Key issues discussed included the significant pass rate disparities between Black and Brown candidates and White candidates, accessibility challenges for candidates with disabilities, and questions about the capacity of the licensing exam to assess competency in social work. The workgroup's subgroups presented recommendations including eliminating the ASWB exam requirement for entry-level licenses (LBSW and LMSW), establishing alternative pathways based on supervised experience, and addressing systemic barriers in the current testing system. ASWB representatives presented on accommodations and non-standard testing arrangements, but many workgroup members expressed frustration with the lack of substantial progress in addressing equity concerns and called for more fundamental reforms to make licensure more accessible and fair.

Final Subgroup Recommendations: The Workgroup's primary recommendation calls for eliminating the requirement for the ASWB exam for entry-level positions, specifically for Licensed Bachelor Social Worker (LBSW) and Licensed Master Social Worker (LMSW) credentials. For clinical licensure (LCSW-C), they propose establishing alternative pathways that

would allow applicants to demonstrate competency through supervised practice hours or other competency-based assessment models rather than relying solely on standardized testing.

The Workgroup also addressed immediate reforms to the current system, recommending that retake fees be waived for candidates who score within a certain range of passing, and that the mandatory waiting period between exam attempts be reduced to minimize delays for aspiring social workers. Additionally, they called for systemic improvements including expanded access to supervision opportunities with enhanced incentives for supervisors, the development of plain language resources to help candidates navigate the licensing process, and specific measures to address ableism and fill data gaps that currently exist in licensing procedures for social workers with disabilities.

The subgroups also recommended using accredited degrees combined with supervision as entry to practice, as well as learning from other states' experiences with elimination of the exam requirement. Illinois was pointed to as a specific example of a state where the exam requirement was eliminated and the state saw a doubling of the social work workforce. They also expressed an urgent need for better methods of evaluating the interpersonal, cultural, and clinical skills needed to effectively practice social work outside of standardized testing. Significant and sustained collaboration and dialogue are essential between social workers and the Maryland Board of Social Work Examiners, as well as the ASWB. This ongoing engagement is crucial for the continuous improvement of professional standards, regulatory practices, and the overall effectiveness of social work services within Maryland. By fostering open communication and mutual understanding, all parties can work together to address emerging challenges, refine licensing procedures, enhance ethical guidelines, and ultimately better serve the public.

Workgroup Chair Final Recommendations

As Chair of this Workgroup, the following recommendations are offered.

Supervision for Practice Hours:

- Consider increasing options for supervisors, such as allowing Category II CEUs for supervisors providing reduced-fee supervision, or providing financial or tax incentives for agencies that offer in-house supervision.
- Maintain permanent options that involve virtual supervision.
- Increase the number of supervisors that are trained in American Sign Language (ASL).

Alternative Pathways to Licensure:

- Expanding alternative pathways to licensure outside of the standardized exam such as increased supervised hours.
- Continue to research other competency based models used in other states and countries to develop alternative models to implement within Maryland.

Fee Waivers:

- Waive fees needed to access and utilize practice tests, as well as to retake the ASWB exam.

Reduction in Waiting Periods:

- Decrease retake waiting periods from 90 days to 30 days regardless of the score obtained on the

initial exam.

Alternative Assessments:

- Remove the requirement for the ASWB licensing exam.
- Develop a licensing exam that is effective across the states that Maryland is currently in compact with, or work to create a national licensing exam.

Unfinished and Ongoing Business

Bias analysis: A framework for the required Bias Analysis was included within the Final Report of the Workgroup, but the full Bias Analysis was not completed due to a lack of identified allocated resources. With further clarification from the General Assembly as to how the Bias Analysis should be executed, and allocated resources to source a skilled analyst to complete the analysis, the Bias Analysis should be complete.

Continued conversations with the Maryland Board of Social Work Examiners and Association of Social Work Boards:

To continue to effectively assess and address the concerns and challenges related to accessing social work licensure, it is paramount that all parties partner in open dialogue and are committed to finding a solution to barriers to licensure. To achieve this, continuing conversations are needed to come to a shared vision and goal. The Workgroup also identified several remaining questions that they would like to continue to discuss with ASWB and the BSWE in the future. These topics include:

- The rationale for displaying licensure methods (e.g. exam, endorsement, etc.) on the website.
- Exam scheduling issues with Pearson Vue, such as limited dates available to schedule an exam.
- Improved methods of communication regarding exam changes.
- Improving the testing experience for deaf-blind test-takers that have accommodation needs.
 - For example, providing accommodations tailored specifically for the test takers needs and preferences (e.g. American Sign Language interpreters for deaf-blind test takers).
- Reducing the need for tiered and indefinite approvals when requesting accommodations.
 - Distinguishing between permanent and temporary disabilities to reduce the burden on test takers to repeatedly request accommodations, including requesting medical certification for each time test taken .

Conclusion

I extend my gratitude to Governor Moore and the members of the Workgroup for their support in my role as Chair. Despite the demanding nature of its work, the Workgroup members demonstrated exceptional dedication, culminating in the significant recommendations presented to the General Assembly. With the conclusion of the Workgroup's official tenure, its members are well-positioned to integrate these efforts into their ongoing professional responsibilities, consistently aiming to bolster the social work workforce and address barriers to social worker licensure.

Appendix: Summary of Workgroup Final Report Recommendations

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

The recommendations of the final report, which was submitted to the General Assembly in 2024, largely focused on addressing statutory mandated tasks including the conduct of a study to examine each type of license under the Maryland Social Workers Practice Act (Title 19 of the Health Occupations Article) as stated in the background of this report.

A synthesized summary that includes the final report's recommendations are provided below:

- 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—the workgroup determined that this task was beyond its capacity and saw a need for an outside contractor to conduct a full Bias Analysis.
 - The report also contained the necessary steps required to conduct a bias analysis on standardized tests. To detect bias in standardized tests, organizations should collect disaggregated demographic data on pass rates, examine test content for cultural bias, and use statistical methods like Differential Item Functioning to identify problematic questions. The analysis should include independent expert reviews, qualitative feedback from test-takers, and consideration of how test failures impact different groups' career prospects.
- Determining whether each type of license is necessary
 - The Workgroup maintains all levels of social work licensure (LBSW, LMSW, and LCSW-C) are necessary, but suggested removing the ASWB exam requirements for LBSW and LMSW licenses. For LCSW-C licensure, the Workgroup proposed offering an alternative pathway to the ASWB exam, modeled after Illinois or Minnesota.
- Identifying alternatives to examination requirements that may be used to assess an applicant's qualifications for each type of license
 - For LCSW-C licensure in the state, the Workgroup recommends establishing alternative pathways, and note that ASWB plans to implement modular retesting by 2026, while also considering adding a jurisprudence exam focused on Maryland ethics and regulations.
- Eliminate bias and make the process for licensing social workers in the State more fair, diverse, and efficient
 - The Workgroup recommends several measures to eliminate bias and improve fairness in social work licensing, including waiving retake fees, reducing the 90-day waiting period between exam attempts, and allowing partial retakes of only failed exam sections starting in 2026.
 - They also propose expanding supervision options to include other behavioral health professionals, offering Category II CEUs for supervision to reduce costs, and creating a comprehensive resource guide to help applicants navigate the licensing process more effectively.
- 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

- The Workgroup recommends 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.
- Identifying barriers in addition to the examination that present challenges to licensure in the State
 - The identified barriers include financial barriers due to the cost of retaking the ASWB exam as well as paying for required clinical supervision. There are also accessibility barriers that impact the deaf and hard of hearing community specifically, as well as the cumbersome process of requesting and receiving accommodations. Structural barriers include the current 90-day waiting period for exam retakes, which delays the licensure process. However, the Workgroup noted that converting to a modular exam format could help by allowing candidates to retake only the sections they failed rather than the entire exam.
- Identifying the circumstances under which unlicensed individuals work in state and federal government positions as Social Workers Findings:
 - The Workgroup found no circumstances under which unlicensed individuals can work as "Social Workers" in state or federal government positions. This reflects Maryland's title protection laws, which legally restrict the "Social Worker" title to licensed professionals only.