

I am Dr. Suzanne Velazquez, PhD, LCSW, LMSW-Clinical, CFSW. I am a Licensed Clinical Social Worker, I am a Clinical Associate Professor at a CSWE-accredited social work program, I am a 20+ year member of NASW, I am a Clinical Supervisor in a private mental health practice and I OPPOSE the removal of social work licensing examinations from the licensing process and implore the Michigan legislature to REJECT the Social Work Licensure Modernization Act (SWLMA) and vote NO to House Bills 5184 & 5185.

The Social Work Licensure Modernization Act is an impulsive and simplistic response to a complex issue and will result in dire consequences for Michiganders and social workers. The SWLMA removes the examination requirement for social workers at all license levels and defers the responsibility of assessing social work practice readiness and competency to individual college faculty and supervisors.

This legislation was created in response to the release of Association of Social Work Boards' (ASWB) 2022 Exam Pass Rate Analysis that demonstrates disparities in pass rates, which disproportionately affect people of color, as well as lower income individuals. While the findings of the ASWB data are concerning and require a thoughtful and holistic response, removing the examination requirement from the social work licensing process would **put the public at risk** (particularly the vulnerable and marginalized), devalue the social work profession (potentially resulting in decreased compensation from employers and insurance companies), and result in social work having the lowest licensing standards of all the mental health professions.

Addressing institutional discrimination is a complex and ongoing process that involves both systemic and individual efforts. Eliminating the examination requirement completely in response to this data is a hasty response, an oversimplified "fix", and an unexamined solution.

Proponents for the SWLMA claim removing the examination from the licensing process will "increase the number of licensed social workers in Michigan to help address workforce shortages". There are other ways to address workforce shortages, such as *incentivizing social work*. **Sacrificing standards and quality to increase quantity is not what vulnerable individuals in Michigan need or deserve.** These "problematic barriers" are safeguards and controls to decrease the likelihood of doing harm or re-traumatizing individuals, and to promote public health and safety. While few states have proposed removing the examination requirement, almost all states currently require the examination for social work licensure and continue to uphold the professional legitimacy of social work as a licensed health profession. While Michigan was the last state to institute licensure for social workers, we should not be one of the first to move towards de-licensing or reducing the scope of licensure for the social work profession by removing the examination requirement in the licensing process.

According to the Substance Abuse and Mental Health Services Administration (SAMHSA), professional social workers are the nation's largest group of mental health services providers. Federal law and the National Institutes of Health recognize social work as one of five core mental health professions, acknowledging that there are more clinically trained, licensed social workers—over 200,000—than psychiatrists, psychologists, and psychiatric nurses combined. While specifics vary by state, **the licensing process for the other mental health professions**, including psychologists, mental health counselors, marriage and family therapists, and professional counselors, **require passing an examination.** Removing the examination

requirement from social work licensure will result in social work having the lowest licensing standards of all health professions.

Research has indicated that both the United States Medical Licensing Examinations (“Medical Board Exams”) and The Uniform Bar Examination (“The Bar”) may be discriminatory. Pass rates vary among different racial and socioeconomic groups. Historically, Black, Hispanic, and lower income individuals are less likely to pass. Additionally, the cost of these examinations, their study materials, and their preparatory courses are quite costly, contributing to more stress and less accessibility for lower income individuals. Despite the data, the requirement of licensing examinations remains part of the process of becoming a practicing physician or lawyer in the United States. Efforts to address the concerns of discrimination include ongoing research, revisions to exam content, and the development of additional assessment methods. The examination requirements have not been removed from the process of becoming a practicing lawyer or physician in the United States because **it is essential that those entering these professions have a minimum level of competence and knowledge**. Many people would not consider receiving services from a lawyer or physician who has not passed the licensing examination. Having licensed social workers for decades, the healthcare system and the clients served by social workers deserve to hold the same expectations that they are receiving mental health services from a healthcare professional that has demonstrated a minimum level of competence and knowledge through passing a licensing exam along with other regulatory requirements.

Michiganders rely on the licensing board to fulfill its responsibility “to **promote and protect the public's health, safety, and welfare**. The Board implements this responsibility by ascertaining minimal entry level competency of health practitioners” (State of Michigan, Office of the Governor, 2023). Reducing the scope of licensing by removing the examination requirement and deferring the Board’s responsibility to individual institutions of higher education risks the professional legitimacy of social work as a profession, as well as erodes the general public’s confidence in receiving quality mental health services.

The argument for the abolishment of the examination requirement is being led by the schools of social work because the industry of higher education’s budgets and enrollments rely heavily on rankings, which are reputationally skewed and impacted by licensure rates. NASW-MI is one of six states that has the largest number of student members and have indicated they have been advocating in favor of the SWLMA in targeted efforts to support the Michigan schools of social work and their student members (NASW-MI, 2023) as future practitioners fearful of being unprepared or not passing the exam or not being able to afford the exam or prep materials. Their messaging is not necessarily in the best interest of the general public, nor their already licensed members. It is also important to note that nearly 60% of all social workers are not members of NASW (Zippia, 2023; NASW, 2023) and their perspectives may not be appropriately represented.

The modifications proposed by the SWLMA would shift the responsibility for evaluating readiness for licensure to professors, universities, and supervisors who carry their own biases, **leading to continued discrimination within the assessment process**. University faculty do not assess an individual’s cumulative knowledge across the wide-ranging content areas of social work. Students are evaluated by faculty on a specific course’s content, which the individual faculty, with varied levels of practice experience, has taught. Often these course

assessments use test banks developed by individual authors and publishers that can vary in validity and reliability and are likely to be more biased than the ASWB examination. In a statement, the ASWB committed to continuing to improve the examinations, “ASWB is committed to leading change in collaboration with social work partner communities toward addressing the 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” (ASWB, 2023).

Nor do Universities endorse an individual’s readiness for independent practice at the clinical level. The completion of required supervised practice is only affirmed through a signed form. The only current requirement for a social worker to provide clinical supervision is to hold a full social work license (currently “LMSW”). There are no mandated additional educational or training prerequisites for clinical supervisors and there exists a lack of standardization in the field of clinical supervision. A formalized process for ensuring the quality and effectiveness of such supervision is absent. Consequently, there is a notable absence of mechanisms to guarantee that the clinical supervision being offered encompasses pertinent and comprehensive education and skill enhancement. With the elimination of the examination at the clinical level, there would be no mechanism for measuring the preparedness and competency for these social workers to serve as clinical supervisors.

I appreciate the time and effort you are taking and the concern expressed for Michiganders’ health and public health. Rather than reducing LARA’s scope of licensing for the social work profession by eliminating the examination requirement as a “quick response” to a growing abolishment movement, there are other ways for the Michigan legislature to address pressing issues of workforce shortages and institutionalized racism, such as ***incentivizing social work***. Some potential alternative actions that could aid in addressing the current challenges of the examination include:

- Address institutionalized racism in the American education systems at all levels, K-12 & University
- Create additional paths to licensure for students that demonstrate test-taking challenges, such as regulated standards of the provision of social work supervision
- Provide free / low-cost study materials
- Provide free / low-cost examination preparation
- Create a voucher program that assists with the cost of registering for the examination for lower income individuals
- Strengthen diverse recruitment practices to hire more BIPOC faculty members in Social Work programs at universities
- Encourage more BIPOC professionals to serve as item writers for the ASWB examinations
- Critically evaluate the licensing examinations on a regular basis and make changes accordingly.

Efforts must be made at every level to address disparities and biases. **Addressing institutional discrimination is a complex and ongoing process that involves both systemic and individual efforts.** For a profession that prides itself on finding creative solutions to complex problems, eliminating the examination requirement completely in response to this data is a hasty response, an oversimplified “fix”, and an unexamined solution. As a Michigan-licensed clinical social worker, I respectfully request that you please reject the SWLMA and vote NO to House Bills 5184 & 5185.

Thank you for your consideration,
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