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January 27, 2026

The Honorable Donna Bailey
Joint Committee on Health Coverage, Insurance and Financial Services
100 State House Station
Augusta, ME 04333

The Honorable Kristi Mathieson
Joint Committee on Health Coverage, Insurance and Financial Services
100 State House Station
Augusta, ME 04333

Re: Testifying NEITHER FOR NOR AGAINST L.D. 2074, "An Act to Update the Requirements for Social Worker Licensure"

Dear Senator Bailey, Representative Mathieson, and Distinguished Committee members,

My name is Cara Sanner. I serve as the Director of Regulatory Services for the Association of Social Work Boards (ASWB). Thank you for the opportunity to provide testimony **Neither for nor against "L.D. 2074, An Act to Update the Requirements for Social Worker Licensure."** I hope the information shared herein is helpful to the committee's consideration of the changes proposed by L.D. 2074.

ASWB was founded in 1979 by a coalition of state licensing boards to develop and administer professional examinations to help regulators make informed licensing decisions. Today, ASWB represents all 64 U.S. and Canadian jurisdictions responsible for regulating practice in Northern America. ASWB's mission is centered on public protection and supporting safe, competent, and ethical practice across the social work profession. ASWB strives to support excellence in social work regulation through resources, services, and technical assistance to the regulatory community. ASWB maintains comprehensive regulatory data to share information and support greater uniformity of law and practice, while respecting jurisdictional autonomy. The comments shared today are intended to offer additional context on the changes proposed by L.D. 2074 as they relate to best practices and regulatory requirements across U.S. jurisdictions.

L.D. 2074 seeks to modernize Maine's social work licensing framework in a way that reflects current practice realities and the evolving needs of Maine communities. ASWB supports thoughtful updates that improve clarity, efficiency, and access, particularly to strengthen workforce, while preserving core public-protection standards that help to ensure licensed social workers are prepared to serve clients safely, competently, and ethically. The bill updates requirements for conditional licenses, establishes policy to recognize clinical experience earned out-of-state, seeks to streamline consultation requirements, broadens eligible degrees for the conditional bachelors license, creates consistency in requirements for DHHS and non-DHHS social workers, and aims to reduce barriers to both initial licensure and re-entry into the profession.

These provisions reflect substantial and careful work, and ASWB appreciates the intent and collaboration that shaped the bill as well as the Committee’s attention to workforce needs and regulatory clarity. ASWB notes that the legislation maintains existing examination requirements and focuses its reforms on areas where modernization can improve access and administrative efficiency without compromising public protection. The social work licensing examination serves as a critical tool to ensure that individuals entering the profession possess the necessary knowledge and skills to practice safely and ethically. It is the only uniform, objective measure of competence across jurisdictions, like the licensing exams utilized in other professions such as medicine, law, and nursing.

With this testimony, ASWB would like to share some additional information that may be useful to the Committee’s work session on the bill. These comments pertain to the expansion of qualifying related degrees for the LSW, conditional license, and the acceptance of clinical supervised practice experience obtained in another jurisdiction. Further, ASWB offers perspective on clinical license requirements, specifically implications for applicants with an MSW lacking a clinical concentration in course work. The state of Maine is a significant outlier across U.S. jurisdictions with respect to its requirements for clinical supervision hours for these license candidates.

Licensed Social Worker, Conditional

L.D. 2074 Sec 10 (3-B) outlines qualifying degrees accepted for the LSW conditional license which includes degrees in fields that are “sufficiently related to social work and social welfare”. ASWB maintains the Model Social Work Practice Act (Model Law) which is vetted by membership and serves as a resource for jurisdictions considering changes to social work statutes and regulations. The Model Law suggests jurisdictions regulate social work practice through three categories of license (bachelors, masters, and clinical). A social work degree is exclusively required for social work licensure. ASWB appreciates circumstances contributing to behavioral health workforce challenges which have prompted jurisdictions to expand the types of coursework accepted for bachelors licensure. And while Maine has historically permitted a degree or course work related to social welfare for the LSW conditional license L.D. 2074 provides greater specificity as to acceptable coursework thereby ensuring consistent application of the law as noted in Sec 10 (3-B). Currently, only twelve U.S. jurisdictions (~20%) permit coursework outside of a BSW or MSW for social work licensure. Separately, five jurisdictions each permit alternative course work for a bachelors or associates license. In two jurisdictions, a combination of related coursework is permitted for both associates and bachelors licenses regulated. This approach is an outlier with the majority of U.S. jurisdictions – 45 – regulating social work with a bachelors license that exclusively requires a BSW. Further, seven jurisdictions, or 13% of all, include an associates license in their regulatory framework which permits non-social work / related coursework.

An important consideration to L.D. 2074’s approach to regulating bachelors practice relates to the Social Work Licensure Compact adopted by Maine in 2024. The Compact functions because participating states agree on key, shared licensure requirements that promote consistency and trust in regulated qualifications across state lines. The compact requires a BSW for the bachelors multistate license. Therefore, Maine Licensed Social Workers licensed without a BSW will not be eligible for a multistate license. A [primer on this issue](#) is available through the compact website hosted by the Council for State Governments.

Recognition of clinical supervision hours earned in another U.S. jurisdiction

L.D. 2074 Section 6 amends 32 MRSA §7053, subsection 1 and adds language requiring the Board to recognize prior experience obtained in Maine or another jurisdiction—even if the applicant was not previously licensed in Maine under the “conditional clinical” category. The bill directs the board to “consider consultation and social work experience previously obtained in this State or another jurisdiction” if it is “substantially equivalent” to Maine’s requirements. The amendment provides an

option for individuals who obtained supervised practice experience in another jurisdiction consistent with the laws of that jurisdiction and that of Maine's, but who were unable to complete clinical licensure requirements in the same jurisdiction and therefore is not eligible for licensure by endorsement pursuant to the Board's rules governing licensure by endorsement. The proposed amendment reflects an emerging area of professional regulation. While best practices have not been established, ASWB recently researched associated provisions and found that 12 jurisdictions have established similar policy as noted in Attachment A.

Clinical license requirements for applicants with an MSW lacking concentration in clinical course work

Although not addressed in L.D. 2074, ASWB would be remiss to not raise awareness of the differences in supervision hour requirements for clinical license applicants presenting with an MSW degree without a concentration in clinical social work practice. At present Maine is an outlier in the number of supervision hours required by these applicants; the average hourly supervision requirement across states is 3,000 hours, as compared to 6,400 hours in Maine.

Currently the Council on Social Work Education, the accrediting body for social work degree programs, does not differentiate between MSW programs focused on clinical social work practice, vs. those focused-on macro practice. Clinical social work involves direct services to individuals, families, and groups, while macro practice focuses on systems, organizations, communities, and policy. They share the same values and ethical foundation, but they differ in unit of intervention, scope of authority, and licensure implications. Clinical social work involves the assessment, diagnosis, and treatment of mental, emotional, and behavioral conditions through direct interaction with clients. Macro practice targets systems rather than individuals, aiming to improve conditions through policy, administration, advocacy, and organizational change.

In legal research performed by ASWB, twelve U.S. jurisdictions have education requirements for clinical licensure beyond an MSW degree accredited by CSWE i.e., they differentiate educational qualifications for clinical vs. macro licensure. However, these jurisdictions primarily perform a transcript review and require applicants to obtain additional coursework to satisfy clinical coursework requirements. In addition, applicants are required to provide evidence of on average 3,000 hours of supervised practice experience. Maine by contrast, requires these individuals to obtain 6,400 hours of supervised practice experience.

In closing, I would like to extend gratitude to Representative Mastraccio and the Department for bringing this bill forward. ASWB appreciates the opportunity to work together on solutions that bring more social workers into Maine's workforce while maintaining strong, consistent public protection standards.

Most respectfully,



Cara Sanner
ASWB Director of Regulatory Services

MEMORANDUM

To: Senator Bailey, Representative Mathieson, and Distinguished Committee members
Joint Committee on Health Coverage, Insurance and Financial Services

From: Association of Social Work Boards
Cara Sanner, Director of Regulatory Services

Re: Clinical supervision policies for the transfer of supervision hours obtained in another
jurisdiction

Date: January 27, 2026

This memo identifies findings from legal research carried out by the Association of Social Work Boards re. policies in U.S. jurisdictions to recognize and permit the transfer of clinical supervision hours obtained outside of a jurisdiction in which clinical licensure is sought. Research was conducted for all 50 states, the District of Columbia and the territories of Guam, Northern Mariana Islands, and the U.S. Virgin Islands. Twelve jurisdictions with applicable policies are noted below.

Arizona

<https://bbhe.az.gov/sites/default/files/pdfs/R4-6-212.01%2001032021.pdf>

Applying out-of-state supervision previously acquired to an Arizona license:

R4-6-212.01 Exemptions to the Clinical Supervision Requirements

2. An individual using supervised work experience acquired outside of Arizona may apply to the Board for an exemption from the clinical supervision requirements in R4-6-404, R4-6-504, R4-6-604, or R4-6-706, as applicable to the license for which application is made. The Board may grant an exemption for clinical supervision acquired outside of Arizona if the Board determines that the behavioral health professional providing the supervision met one of the following:
 - a. Complied with the educational requirements specified in R4-6-214,
 - b. Complied with the clinical supervisor requirements of the state in which the supervision occurred, or
 - c. Was approved to provide supervision to the applicant by the state in which the supervision occurred.

California

https://bbs.ca.gov/pdf/regulation/pending/sup_related_req_isor.pdf

§ 4996.17.2. Applicants for licensure with education or experience gained outside California who do not qualify for reciprocity; acceptance of education or experience; additional requirements; qualification for licensure without taking clinical examination

(b) The board shall accept experience gained outside of California for the purpose of satisfying the licensure requirements if the experience is substantially the equivalent to the requirements of this chapter. If the applicant has fewer than 3,000 hours of qualifying supervised experience, the board shall accept as qualifying experience the amount of time the applicant held an active license in good standing in another state or country as a clinical social worker at the highest level for independent practice at a rate of 100 hours per month, up to a maximum of 1,200 hours.

<https://www.bbs.ca.gov/pdf/publications/lawsregs.pdf>

§ 1870.5. Supervision of Experience Gained Outside of California.

(a) Experience gained outside of California must have been supervised in accordance with the following criteria:

(1) At the time of supervision, the supervisor was licensed or certified by the state or jurisdiction in which the supervision occurred, and possessed a current and active license or certification that was not under suspension or probation.

(2) The supervisor must have been licensed or certified by that state or jurisdiction for at least two (2) of the past five (5) years immediately prior to acting as a supervisor, as either a psychologist, clinical social worker, physician certified in psychiatry by the American Board of Psychiatry and Neurology, professional clinical counselor, marriage and family therapist or similarly titled marriage and family practitioner, or other equivalent license or certification that allows the practitioner to independently provide clinical mental health services.

District of Columbia

<https://dchealth.dc.gov/sites/default/files/dc/sites/doh/publication/attachments/Chapter%2070%20Social%20Work%209-8-17.pdf>

Title 17 District of Columbia Municipal Regulations

7006.5 An applicant for licensure in the District of Columbia who has obtained his or her required three thousand (3000) hours of post-master's or postdoctoral experience outside of the District of Columbia:

(a) Shall submit proof satisfactory to the Board that the hours were valid or legally recognized in the jurisdiction in which they were obtained; and

(b) Shall submit proof satisfactory to the board that the applicant's supervisor met one of the following requirements:

(1) The supervisor was licensed in good standing in the United States as an independent social worker or independent clinical social worker, as applicable;

(2) The supervisor was licensed in good standing in the United States at a level equivalent to that of an District of Columbia independent social worker or independent clinical social worker, as applicable; or

(3) The supervisor was qualified for licensure, in good standing, as an independent social worker or independent clinical social worker in the District of Columbia, as applicable, regardless of whether or where the supervisor was licensed

7006.6 If the applicant has obtained less than the required thousand (3000) hours of post-master's or postdoctoral experience, the applicant must obtain the remaining hours in or out of the District of Columbia before he or she will be granted licensure. If the applicant elects to

complete the hours in the District of Columbia, the applicant must first obtain licensure under the Act at the next lower level, for which the applicant is qualified, in order to engage in supervised practice within the District.

7006.7 The Board shall recognize the hours validly or legally obtained outside of the District of Columbia and apply the hours toward the applicant's required total for licensure

Idaho

<https://adminrules.idaho.gov/rules/2023%20Archive/24/241401.pdf>

04. Out-of-State Supervised Experience. The Board may consider supervised experience obtained outside the state of Idaho submitted for Idaho licensure purposes as prescribed under Section 210.03 and consistent with that jurisdictions laws. Such experience, whether already obtained or planned to be obtained, must be included in the plan for supervision and reviewed and approved by a designated Board member. (3-28-23)

a. Previous supervised experience must have been obtained within the five (5) year period preceding the submission of the plan for supervision and must have been obtained in compliance with the law and rules of the state in which the experience was obtained.

Indiana

<https://www.in.gov/pla/professions/behavioral-health-and-human-services/behavioral-health-and-human-services-licensing-information/>

Per the Board's website: Applicants must submit proof of two (2) years of experience in the practice of clinical social work in counseling of clients in a clinical setting. If hours are obtained in Indiana they must occur under an Active LSW license or Temporary LSW Permit. The experience must be paid, full-time and supervised to qualify as experience. Part-time experience will be considered by the Board. (Note: One thousand five hundred hours (1,500) equals one (1) year of experience.) Under no circumstances can this experience requirement be met in less than twenty-four (24) months This form may be duplicated if you completed the required two (2) years of experience with more than one employer. To qualify as experience you must have been providing clinical social worker services, including assessment and evaluation of clients, in which at least fifty percent (50%) of this time consisted of providing services directly to clients. Please upload these forms to your account.

Kansas

<https://www.ksbsrb.ks.gov/professions/social-workers/faqs>

Per the board's website: The supervision and the experience hours accrued in another state will be reviewed and compared with the requirements for specialist clinical licensure in Kansas. The hours and supervision will need to meet Kansas requirements in order to be accepted.

Kentucky

https://bsw.ky.gov/Supervision%20Forms/Supervision_Supervised%20Experience%20Documentation%20Form.doc

Per the board's website: Out of State Experience

A clinical social worker licensed in another state must submit the following documentation verifying that the supervision experience received in the licensing state meets the requirements of 201 KAR 23:070.

1. Supervision Experience Documentation Form (Part I, II, and III)
2. An official job description on agency letterhead signed by the Executive Director, Human Resources Director, or Agency Supervisor for employment setting where supervision occurred.
3. Official verification of the supervisor's credentials.

<https://apps.legislature.ky.gov/law/kar/titles/201/023/070/>

201 KAR 23:070. Qualifying education and clinical practice experience under supervision

(2) An applicant who receives clinical practice experience under supervision in another jurisdiction shall demonstrate that:

(a) His or her clinical practice experience under supervision met the legal requirements of that jurisdiction; and

(b) The board shall give credit for supervision hours obtained in accordance with the legal requirements of the other jurisdiction.

(3) An applicant from another jurisdiction shall submit proof of issuance of a valid license, permit, certificate, registration, or other authorization issued by another jurisdiction that is in good standing

Louisiana

La. Admin. Code tit. 46, § XXV-503 - LMSWs Seeking the LCSW Credential | State Regulations | US Law | LII / Legal Information Institute

§ 503. LMSWs Seeking the LCSW Credential

O. If the LMSW receives supervision outside of the state of Louisiana, that supervision will be accepted if:

1. the supervisor has completed the authorized forms of the Louisiana State Board of Social Work Examiners; and
2. the supervisor is licensed at the time of supervision at a level substantially equivalent to a LCSW-BACS in the other state and submits the license verification of out of state supervisor form (available from board office).

Minnesota

[Sec. 148E.120 MN Statutes](#)

148E.120. Requirements of supervisors

(b) The board shall approve up to 100 percent of the required supervision hours by an alternate supervisor if the board determines that:

(1) there are five or fewer supervisors in the county where the licensee practices social work who meet the applicable licensure requirements in subdivision 1;

(2) the supervisor is an unlicensed social worker who is employed in, and provides the supervision in, a setting exempt from licensure by section 148E.065, and who has qualifications equivalent to the applicable requirements specified in sections 148E.100 to 148E.115;

- (3) the supervisor is a social worker engaged in authorized social work practice in Iowa, Manitoba, North Dakota, Ontario, South Dakota, or Wisconsin, and has the qualifications equivalent to the applicable requirements in sections 148E.100 to 148E.115; or
 - (4) the applicant or licensee is engaged in nonclinical authorized social work practice outside of Minnesota and the supervisor meets the qualifications equivalent to the applicable requirements in sections 148E.100 to 148E.115, or the supervisor is an equivalent mental health professional, as determined by the board, who is credentialed by a state, territorial, provincial, or foreign licensing agency; or
 - (5) the applicant or licensee is engaged in clinical authorized social work practice outside of Minnesota and the supervisor meets qualifications equivalent to the applicable requirements in section 148E.115, or the supervisor is an equivalent mental health professional as determined by the board, who is credentialed by a state, territorial, provincial, or foreign licensing agency.
- (c) In order for the board to consider an alternate supervisor under this section, the licensee must:
- (1) request in the supervision plan and verification submitted according to section 148E.125 that an alternate supervisor conduct the supervision; and
 - (2) describe the proposed supervision and the name and qualifications of the proposed alternate supervisor.

Mississippi

[PROFESSIONAL SUPERVISION REQUIREMENTS FOR LCSW LICENSURE 2020.pdf](#)

Rule 30-1902-2.3 Professional Supervision requirements for LCSW Licensure

4. Licensees who have completed supervision hours in other jurisdictions may apply to have those hours count towards their LCSW supervision in Mississippi if the Board finds that the other jurisdiction processes are similar to Mississippi and appropriate verification is received from the originating jurisdiction. The applicant is responsible for ensuring that the Board receives acceptable verification from the originating jurisdictions.

Oklahoma

[Agency Rules Revised 2025 - 05 28 2025.pdf](#)

675:12-1-8. Out of state supervision

Social workers seeking to transfer their licensure supervision as a new resident of this state will be required to provide documentation of supervision hours from the previous jurisdiction to assure the hours accrued conform to the requirements for social work supervision as outlined in the Oklahoma Social Work Practice Act. The Board may review documentation of supervision hours from other jurisdictions on a case-by-case basis.

Wisconsin

[DSWS Social Worker - Licensed Clinical](#)

Supervised clinical social work hours obtained in another state may be accepted towards the 3000 hours requirement.