

My name is Joy Kim, an associate professor at the Rutgers University School of Social Work. I am a social work educator but today I want to speak as a researcher who studies licensure issues within the U.S. workforce, particularly in the social work sector. I have published many articles on social work regulations, licensure exemption, licensure compact, and competence assessment, and also conducted empirical analyses on licensees. I am currently analyzing the ASWB exam data to learn more about factors that affect exam scores and pass rates.

**Graduating from an accredited program does not mean that the graduates are competent for entry-level practice.** I was recently invited to present to the CSWE board of directors meeting about the role of CSWE in the workforce. In that meeting, I reported that there are no ways to externally validate graduation from social work programs for graduates' competence. A survey (Sellers & Neff, 2019) of 116 Deans/Directors of social work programs found that most schools (58.8%) are using a combination of embedded assessments (tests, papers, etc.) and that 90% used field education-based assessments to assess practice behaviors. Yet, "little is known about the validity or reliability of these measures of competence (Tajima et al., 2022, p. 46). Others note evidence of leniency bias, or a tendency to evaluate students more positively, among field instructors (Bogo et al., 2011; Drechsler et al., 2020; Jensen et al., 2019).

Fundamentally, licensure exists to safeguard the public. Most social workers are employed as behavioral health care workers providing mental health and substance abuse services to the most vulnerable individuals. A 2020 study by NASW and CSWE suggests that most employers hiring social workers in the behavioral healthcare sector expect them to be licensed (NASW & CSWE, 2020) because it is critical to ensure that social workers are competent in safe and ethical practices for their clients.

Approximately 76% of the U.S. healthcare workforce is licensed or certified, and social work is one of them. Licensure systems ensure that only practitioners assessed as competent can practice. The nationally standardized exams are crucial for this competence assessment.

Removing the exam requirement would dismantle the licensure system, as licensure cannot exist without certifying individuals through assessment. Most licensed professions - including medicine, law, nursing, physical therapy, accounting, psychology, and teaching – rely on national, standardized exams to certify competent individuals for their professions. Standardized exams continue to be used as a cost-effective means to distinguish competent individuals from those not for public safety. Can you imagine getting services from nurses and physicians who are not certified?

In my publication last year (Kim, 2023), I summarized that numerous studies highlight instances where social workers can harm their clients through incorrect, unsafe, and unethical practices (such as dual relationships or criminal behaviors) (Boland-Prom et al., 2015). **Evidence also shows that social workers licensed through grand-fathering without the exams were twice as likely to have been found to jeopardize clients' safety** (Kindernechts, 1995). Evidence in Medicine and law also revealed that certification exam scores are related to consumer safety (Anderson & Muller, 2019; Cuddy et al., 2017; Tamblyn et al., 2007).

Despite burdens associated with occupational regulations, evidence suggests that licensure helps narrow racial and gender wage gaps (Blair & Chung, 2019), indicating that it is particularly important for African American and female workers. My empirical research shows that licensed social workers earn about 10-11% more than their non-licensed counterparts (Kim et al., 2023). As most social workers are dissatisfied with their earnings (NASW & CSWE, 2020), the license-related earnings gain cannot be dismissed. **When the exam requirement is removed, the license-related earnings gain will likely disappear.** The workforce shortage issues in the social work industry can be related to low earnings among social workers. So, letting go of the license-related earnings gains by eliminating the exam requirement may potentially intensify the workforce issues in the future.

In conclusion, a licensure system exists to ensure public safety, and competence assessment through exams is a crucial part of the system. It also boosts social workers' earnings significantly. I hope you carefully consider the implications of removing the exam requirement. Thank you.

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