January 18, 2023

Michigan Board of Social Work
Attn: Chair, Julian Diaz

Members of the Michigan Board of Social Work:

As you are aware, the Association of Social Work Boards (ASWB) recently released their 2022 ASWB Exam Pass Rate Analysis, which highlighted what many social workers and test takers, particularly social workers of color and older social workers, knew to be true—that significant disparities in the pass/fail rate among social workers exist. The disparity highlights a significant flaw in the exam and creates significant barriers for many to enter the field.

Last year, the Department of Licensing and Regulatory Affairs collaborated with Michigan’s schools of social work to provide ten years worth of data about passing scores. This was done in part because for decades schools and organizations were told outright by ASWB that pass rate data by age and race did not exist and that the only way to obtain demographic information was at the state level. That has proven to be false.

Our Michigan schools performed an independent data analysis, which corroborates the disparities highlighted by ASWB this fall.

The National Association of Social Workers (NASW) standards assert that all social work institutions, programs, schools, and licensing boards are called to address systemic racism and bias in our profession. We are called to ask challenging questions, including whether standardized testing is the best method to equitably evaluate a profession’s competency. In light of the data released, we are called to act.

NASW-Michigan convened several statewide listening sessions where social workers came together to share stories of their experiences with the licensure process and exam, and to provide forums for solutions. What was echoed over and over is that many licensure candidates have sat for the exam multiple times, frustrated by the lack of real world application of the questions, out-of-date language, language that perpetuates stereotypes and bias about vulnerable populations in the questions, and many failing by one or two points. Test takers we heard from have attempted the exam numerous times, at significant financial cost, some upward of 15 times (at $230 or $260 per attempt). Social workers have lost employment, missed promotional opportunities, and experienced quantifiable harm financially due to an inability to pass this exam.

We also heard from organizations and practice owners who shared that they continue to experience excessive wait periods for their clients due to staffing shortages. Some of these shortages are attributed to an inability for some of their staff to pass the exam (not due to professional competency).
Additionally, NASW-Michigan has met with the Deans and Directors of the Michigan social work programs several times, other social work organizations, and participated in nearly 100 state and national meetings around the licensing exam and potential solutions. Through these coalitions, a set of recommendations has been drafted and approved by the NASW-Michigan Board of Directors.

We hope that the Michigan Board of Social Work will work with us in advocating for necessary changes to our licensure process. Michigan has had licensure for just under twenty years, and this will be the first major effort to reflect and make updates.

The State of Michigan has remained diligent in ensuring that, through licensure and title protection, we protect both the profession and consumers. We believe this should remain at the forefront of our discussions. We support robust multi-tier licensing, expanding licensure portability, and will continue to advocate to protect that as well as the highest standards in continuing education that our state is known for.

We propose the following initial licensure level requirements:

- Licensed Bachelor Social Worker (LBSW): successful completion of a bachelors degree from a CSWE accredited institution
- Licensed Master Social Worker (LMSW): successful completion of a masters degree from a CSWE accredited institution (This level would replace the current limited license at the Masters level, and incorporate the Advanced Generalist option)
- Licensed Clinical Social Worker (LCSW): successful completion of a masters degree from a CSWE accredited institution, completion of 4,000 supervised post-graduate hours under a Licensed Clinical Social Worker, and passage of a nationally recognized clinical exam or alternative competency measure (when available)

Continuing education standards should remain in place for all levels of licensure.

Furthermore, we encourage the Michigan Board of Social Work to engage in advocacy with the Association of Social Work Boards (ASWB). We urge the Michigan Board of Social Work to request the following on behalf of Michigan social workers:

- That the ASWB waive or significantly reduce all retesting fees for social workers who wish/need to retest.
- Immediately make the ASWB practice exam available for free to all social workers. (Currently $85) (https://www.aswb.org/exam/getting-ready-for-the-exam/online-practice-test/)
- Immediately remove the requirement that work hours be completed before candidates are eligible to sit for the exam
- That the ASWB release Michigan-specific de-identified data for all questions so that the board may conduct an independent evaluation of the data for Michigan.
- That ASWB review passing score and look at expanding the pass range by several additional questions

The Social Work Code of Ethics calls us to uphold the value of social justice, calling all social workers, and institutions that support social work, to challenge social injustice. Specifically, “social workers strive to ensure access to needed information, services, and resources; equality of opportunity...” Data exists that indicates that our own institutions and systems do not offer equality of opportunity. We call on the Michigan Board of Social Work to work collaboratively to make Michigan a premier state for social work and immediately move to ensure no further harm is
done, while intentionally seeking more data and creating long-term solutions that are rooted in our core values and equity focused.

We appreciate your immediate attention to this pressing matter and I look forward to speaking with you further about the issues of Michigan social workers and the recommendations we have put forward.

Sincerely,

Duane Breijak, LMSW-Macro
Executive Director
National Association of Social Workers - Michigan Chapter

1. ASWB Exam Pass Rate Analysis