

Dear Board:

I am writing to ask you to assess and/or discontinue the use of the clinical exam for licensure as a (Social Worker, Marriage and Family Therapist, or Professional Counselor) in our state. Sustaining an expensive, time-consuming barrier to licensure, especially if it is inequitable and lacks the predictive validity of competence and safety of clinicians, causes harm to our communities in light of a mental health workforce shortage and lack of access to critical mental health care.

I am requesting an assessment of our state's clinical exam for licensure to determine if it is fair and representative across demographic groups of test takers. Recent reporting by the Association of Social Work Boards<sup>1</sup> (ASWB) highlights that there are racial disparities in first time passing scores on the social work licensing exam by test takers who are Black as compared to test takers of other races. Other exams have not yet been public about the potential demographic differences between first-time test takers and their abilities to pass the exam. You can find additional information on the problems to identify and address in clinical exams in a white paper<sup>2</sup> by Dr. Benjamin E. Caldwell and Dr. Tony Rousmaniere.

An assessment such as this is necessary to determine if there is further action that needs to be taken to determine if the pathways to licensure are truly fair and equitable to all potential licensees. If, as the ASWB exam has shown, there are disparities, I would like to further request that the continued use of the clinical exam as the sole pathway to licensure be evaluated and alternative methods for licensing clinicians be identified.

At a time when we are in the midst of a national mental health crisis with existing provider shortages, it appears we are further burdening the current workforce by limiting our ability to obtain a larger, more diverse and representative workforce now and in the future. In order to address these issues for the better treatment of the public, we need to be looking for ways to increase our workforce. Systems have already been in place in Illinois that removed the licensing exam completely for bachelor's level social workers that led to an immediate increase in the number of available mental health professionals. Additionally, for several years Texas had an alternative pathway to licensure for therapists who were unable to pass the clinical exam, but were still offered a pathway to licensure through monitored work with a clinical supervisor and providing a portfolio to the licensing board.<sup>3</sup> There are opportunities for innovation and solutions available to increase our mental health workforce. I'm requesting that you focus your attention on this matter during this critical time.

Thank you for your consideration in addressing this issue and helping to improve the mental health workforce's ability to address our current crisis.

Sincerely,

(Name and Credential)

<sup>1</sup><https://www.aswb.org/wp-content/uploads/2022/07/2022-ASWB-Exam-Pass-Rate-Analysis.pdf>

<sup>2</sup><https://www.psychoterapynotes.com/wp-content/uploads/2022/10/Clinical-Licensing-Exams-in-Mental-Health-Care-October-2022.pdf>

<sup>3</sup>Alexander, L., & Johnson, B. (2008). Final Report on Alternative Paths to Licensure for the Minnesota Board of Social Work. Lindsey Alexander Consulting.  
[https://mn.gov/boards/assets/Alternative%20Paths%20to%20licensure%20executive%20summary%2008\\_tcm21-35666.pdf](https://mn.gov/boards/assets/Alternative%20Paths%20to%20licensure%20executive%20summary%2008_tcm21-35666.pdf)