Maryland
STATE DEPARTMENT OF EDUCATION

Carey M. Wright, Ed.D.
State Superintendent of Schools

TO: Members of the Education Policy Committee

FROM: Carey M. Wright, Ed.D., State Superintendent of Schools

DATE: October 13, 2026

SUBJECT: COMAR 13A.12.04.11 *Educator Licensure, Specialists, School Social Worker*
COMAR 13A.05.05.01 *General Requirements*
COMAR 13A.05.05.16 *School Social Worker Program*
Request for Adoption

Purpose

The purpose of this item is to request adoption of the amended regulations COMAR 13A.12.04.11 *Educator Licensure, Specialists, School Social Worker* and COMAR 13A.05.05.01 *General Requirements*, and the new regulation COMAR 13A.05.05.16 *School Social Worker Program*.

Background

School social workers support mental health, emotional and social growth, and improved academic outcomes for all students. In order to practice social work in Maryland or to refer to oneself as a social worker, an individual must be licensed by the Maryland Board of Social Work Examiners. Once licensed by the Maryland Board of Social Work Examiners, Maryland State Department of Education (MSDE) Educator Licensure describes school social workers as "Specialists." School social workers have been employed by Maryland schools for several decades, but COMAR has not included language regarding the role and program of school social workers as part of the required coordinated program of pupil services. Maryland school social workers advocated that the position of School Social Workers be recognized in COMAR as part of the coordinated program of pupil services, as are school counselors and school psychologists. MSDE met with and communicated with seven Licensed School Social Workers, from across the State, to provide input on the proposed amendments and additions.

Executive Summary

The proposed amendments and new language for these regulations define, update, and clarify the requirements for school social worker licensure and programs. The regulations support the role of school social workers in working with families, school administrators, educators, and other professionals to create supportive learning and social environments for all students. COMAR 13A.12.04.11 *Educator Licensure, Specialists, School Social Worker* defines a school social worker and aligns licensure language from the Maryland State Board of Social Work Examiners. COMAR 13A.05.05.01 *General Requirements* adds school social work to the coordinated program of pupil services which includes school counseling, pupil personnel, school psychology, and health services. COMAR 13A.05.05.16 *School Social Worker Program* defines the program objectives and the standards of the profession.

Process

MSDE brought COMAR 13A.12 and COMAR 13A.05 School Social Worker regulations to the State Board at the June 18, 2026, meeting of the State Board. The State Board voted to grant permission to publish COMAR 13A.12 and COMAR 13A.05 School Social Worker regulations. The draft regulations were published in the Maryland Register from September 5, 2026, to October 5, 2026, for public comment.

Comments were received from 23 respondents. Of these, nineteen comments were from school social workers and four comments were from others including a registrar and an assistant principal. All comments were supportive of the regulation. Topics included support for the proposed regulations and the importance of school social workers. Four comments included a request for more school social workers and/or additional funding.

Action

MSDE requests adoption of the amended regulations COMAR 13A.12.04.11 *Educator Licensure, Specialists, School Social Worker* and COMAR 13A.05.05.01 *General Requirements,* and the new regulation COMAR 13A.05.05.16 *School Social Worker Program.*

Attachments

COMAR 13A.12 and COMAR 13A.05 School Social Worker Slide Deck
COMAR 13A.12.04.11 Educator Licensure, Specialists, School Social Worker
COMAR 13A.05.05.01 General Requirements
COMAR 13A.05.05.16 School Social Worker Program
Summary of COMAR 13A.12 and COMAR 13A.05 School Social Worker comments
All comments received related to COMAR 13A.12 and COMAR 13A.05



COMAR 13A.12 and COMAR 13A.05 School Social Worker

DIVISION OF STUDENT SUPPORT AND FEDERAL PROGRAMS

Presented By | Mary L. Gable, Assistant State Superintendent

October 13, 2026

Maryland
STATE DEPARTMENT OF EDUCATION

MSDE Strategic Plan Goals

1

Every child has access to a high-quality early childhood program.



PILLAR 1: EARLY CHILDHOOD EDUCATION

2

Every school has high-quality and diverse teachers and leaders.



PILLAR 2: HIGH-QUALITY & DIVERSE TEACHERS AND LEADERS

3

Every student graduates high school college and career ready.



PILLAR 3: COLLEGE AND CAREER READINESS



Every student is matched with the resources they need to ensure their success.

4

PILLAR 4: MORE RESOURCES FOR STUDENT SUCCESS



Every school and district receives a rating of ___ or higher.

5

PILLAR 5: GOVERNANCE AND ACCOUNTABILITY

Visit the Maryland State Department of Education website to learn more about the Strategic Plan!

strategicplan.marylandpublicschools.org

STRATEGIC PLAN ALIGNMENT



GOAL 4

Every student is matched with the resources they need to ensure their success.

4.E Increase the percentage of schools that have at least 2.0 FTE positions for student support professionals (e.g. school counselors, social workers, school psychologists, student personnel workers, mental health professionals, career counselors, behavioral interventionists, etc.).

Summary of the Regulation

The proposed amendments and new language for these regulations define, update, and clarify the requirements for school social worker licensure and programs. The regulations support the role of school social workers in working with families, school administrators, educators, and other professionals to create supportive learning and social environments for all students.

- COMAR 13A.12.04.11 *Educator Licensure, Specialists, School Social Worker* defines a school social worker and aligns licensure language from the Maryland State Board of Social Work Examiners.
- COMAR 13A.05.05.01 *General Requirements* adds school social work to the coordinated program of pupil services which includes school counseling, pupil personnel, school psychology and health services.
- COMAR 13A.05.05.16 *School Social Worker Program* defines the program objectives and the standards of the profession.

Process

- MSDE brought COMAR 13A.12 and COMAR 13A.05 School Social Worker regulations to the State Board at the June 18, 2026, meeting of the State Board. The State Board granted permission to publish the regulation. The draft regulation was published in the **Maryland Register** from **September 5, 2026, to October 5, 2026**, for public comment.

- Comments were received from 23 respondents.
  - 19 comments were from social workers.
  - Four comments were from others, including a registrar and an assistant principal.
  - **All comments were supportive of the regulation**.
  - Topics included support for the proposed regulations and the importance of school social workers.
  - Four comments included a request for more school social workers and/or additional funding.

COMAR 13A.12 and COMAR 13A.05 - School Social Worker Regulations

- June 18, 2026: COMAR 13A.12 and COMAR 13A.05 School Social Worker regulations presented to the State Board; State Board approved permission to publish
- September 5 to October 5, 2026: COMAR 13A.12 and COMAR 13A.05 School Social Worker regulations were posted in the Maryland Register
- October 13, 2026: COMAR 13A.12 and COMAR 13A.05 School Social Worker regulations presented to the State Board Education Policy Committee (EPC).
- October 27, 2026: With approval of the EPC, MSDE will request approval of the State Board to adopt COMAR 13A.12 and COMAR 13A.05 School Social Worker regulations.

COMAR 13A.12 – Educator Licensure

Chapter 04 Specialists

.01 - General Requirements.

Definition. “School social worker” means an individual who is a mental health professional, with a license in social work, who provides services related to a person's social, emotional, and life adjustment to school and/or society.

A. To obtain an MSDE educator licensure as a school social worker, the applicant shall:

(1) Be licensed by the Maryland State Board of Social Work Examiners, Health Occupation Title 19. Social Workers, Subtitle 3 Licensing § 19-301., as a:

(a) Licensed Masters Social Worker (LMSW);

(b) Licensed Certified Social Worker (LCSW); or

(c) Licensed Certified Social Worker – Clinical (LCSW-C).

(2) Complete 3 semester hours or State-approved CPD credits in special education coursework.

COMAR 13A.05 – Special Instructional Programs

Chapter 05 – Programs of Pupil Services

.11 School Social Worker.

A. Each local school system shall provide a coordinated program of pupil services for all students which shall include but not be limited to:

(1) School counseling;

(2) Pupil personnel;

(3) School psychology;

(4) Health services; and

(5) School Social Work

B. The Pupil Services Program:

(1) Shall focus on supporting student wellness, including physical, mental, and behavioral health.

(2) (2) Support social and emotional development to facilitate the academic achievement and career development of all students.

C. through G – NO CHANGE

COMAR 13A.05 – Special Instructional Programs

Chapter 05 – Programs of Pupil Services

.16 School Social Worker Program

A. The School Social Worker Program is a program that:

(1) Promotes student academic success and well-being;

(2) Enhances awareness of mental health and promotes positive, healthy behaviors;

(3) Provides school-based prevention and universal and targeted interventions for students with mental health and behavioral health concerns;

(4) Is aligned with school system goals and objectives;

(5) Is an integral component of the school's program and mission;

(6) Addresses the needs of the whole child so that each student has the opportunity to be healthy, safe, engaged, supported, and challenged or long-term success; and

(7) Is monitored and reviewed through accountability systems.

B. School Social Workers are:

(1) Trained mental health professionals, with a license in social work, who provide services related to student wellbeing in academics, school climate, social-emotional development, and mental health.

(2) (The link between the home, school, and community in providing direct as well as indirect services to students, families, and school personnel to promote and support students' academic and social success.

(3) State-credentialed as defined in COMAR 13A.12.04.11.

COMAR 13A.05 – Special Instructional Programs

Chapter 05 – Programs of Pupil Services

.16 School Social Worker Program

C. School Social Workers shall:

(1) Adhere to the ethics and values of the social work profession to guide ethical practice while understanding the unique aspects of school social work practice and the needs of the students, families, educational settings, and communities they serve.(The link between the home, school, and community in providing direct as well as indirect services to students, families, and school personnel to promote and support students' academic and social success.

(2) Meet the provisions for professional practice of the State Department of Education and possess knowledge and understanding basic to the social work profession as well as the local education system.

(3) Conduct assessments with the goal of improving student social, emotional, and academic learning outcomes.

(4) Use assessment as the starting point of intervention within a multitiered system of supports.

(5) Use data to guide service delivery and to evaluate their practice regularly to determine if services and supports need to be faded, continued, added, or increased.

(6) Maintain accurate data and records that are relevant to assessment, planning, implementation, and evaluation of school social work services.

(7) Shall organize their workloads to fulfill their responsibilities and clarify their critical roles within the educational mission of the school and county in which they work.

(8) Shall use technology to enhance communication; to design and deliver services; to obtain, manage, and store information; and to demonstrate accountability to students and families in the school setting.

COMAR 13A.05 – Special Instructional Programs

Chapter 05 – Programs of Pupil Services

(9) Shall engage in professional development to provide students, families, schools, and communities with the highest-quality, culturally informed services

(10) Shall ensure that students and their families are provided services within the context of multicultural understanding and competence.

(11) Shall share leadership in developing a positive school climate.

(12) Shall also work collaboratively with school administration, school personnel, family members, and community partners to increase accessibility to and effectiveness of all services.

(13) Shall engage in advocacy that seeks to ensure that all students have equal access to education and services to enhance their academic progress.

(14) Shall provide a pivotal role in creating and executing a schoolwide safety plan and provide direct and indirect services that relate to all safety concerns of students, families, and educators.

(15) Shall be prepared for changes in the needs of the school community they serve and how services will be delivered when a natural disaster, (public) emergency, and/or pandemic occurs.

(16) Shall uphold the confidentiality of the students and families they serve in all formats (verbal, written, and electronic communication) according to federal, state, and local regulations and policies.

COMAR 13A.12 – Educator Licensure

Chapter 04 Specialists

.11 School Social Worker.

A. Definition. "School social worker" means an individual who is a mental health professional, with a license in social work, who provides services related to a person's social, emotional and life adjustment to school and/or society.

B. To obtain *an MSDE* educator licensure as a school social worker, the applicant shall:

[A.] *(1)* Be licensed by the Maryland State Board of Social Work Examiners*, Health Occupation Title 19. Social Workers, Subtitle 3 Licensing § 19-301.,* as a:

[(1)] *(a)* Licensed Masters Social Worker *(LMSW)*;

[(2)] *(b)* Licensed Certified Social Worker *(LCSW)*; or

[(3)] *(c)* Licensed Certified Social Worker – Clinical *(LCSW-C)*.

[B.] *(2)* Complete 3 semester hours or State-approved CPD credits in special education coursework.

COMAR 13A.05 – Special Instructional Programs

Chapter 05 – Programs of Pupil Services

.01 - General Requirements.

A. Each local school system shall provide a coordinated program of pupil services for all students which shall include but not be limited to:

(1) School counseling;

(2) Pupil personnel;

(3) School psychology; [and]

(4) Health services*; and*

(5) School Social Work

B. The Pupil Services Program:

(1) Shall focus on supporting student wellness, including physical, mental, and behavioral health.

(2) Support social and emotional development to facilitate the academic achievement and career development of all students.

C. through G – NO CHANGE

.02 - School Counseling Program.

.03 - Pupil Personnel Program.

.04 - School Psychology Program.

.05 - School Health Services Standards — Introductions.

.06 - School Health Services Standards — Definitions.

.07 - School Health Services Standards — For All Students.

.08 - School Health Services Standards — For All Students with Special Health Needs.

.09 - School Health Services Standards — Emergency Services.

.10 - School Health Services Standards — Health Facilities.

.11 - School Health Services Standards — Staff Development.

.12 - School Health Services Standards — Dissemination of School Health Services

.13 - School Health Services Standards — Implementation and Coordination.

.14 - School Health Services Standards — Monitoring and Evaluation.

.15 - School Health Services Standards — Confidentiality and Consent.

.16 School Social Worker Program

A. The School Social Worker Program is a program that:

(1) Promotes student academic success and well-being;

(2) Enhances awareness of mental health and promotes positive, healthy behaviors;

(3) Provides school-based prevention and universal and targeted interventions for students with mental health and behavioral health concerns;

(4) Is aligned with school system goals and objectives;

(5) Is an integral component of the school's program and mission;

(6) Addresses the needs of the whole child so that each student has the opportunity to be healthy, safe, engaged, supported, and challenged or long-term success; and

(7) Is monitored and reviewed through accountability systems.

B. School Social Workers are:

(1) Trained mental health professionals, with a license in social work, who provide services related to student wellbeing in academics, school climate, social-emotional development, and mental health.

(2) The link between the home, school, and community in providing direct as well as indirect services to students, families, and school personnel to promote and support students' academic and social success.

(3) State-credentialed as defined in COMAR 13A.12.04.11.

C. School Social Workers shall:

(1) Adhere to the ethics and values of the social work profession to guide ethical practice while understanding the unique aspects of school social work practice and the needs of the students, families, educational settings, and communities they serve.

(2) Meet the provisions for professional practice of the State Department of Education and possess knowledge and understanding basic to the social work profession as well as the local education system.

(3) Conduct assessments with the goal of improving student social, emotional, and academic learning outcomes.

(4) Use assessment as the starting point of intervention within a multitiered system of supports.

(5) Use data to guide service delivery and to evaluate their practice regularly to determine if services and supports need to be faded, continued, added, or increased.

(6) Maintain accurate data and records that are relevant to assessment, planning, implementation, and evaluation of school social work services.

(7) Shall organize their workloads to fulfill their responsibilities and clarify their critical roles within the educational mission of the school and county in which they work.

(8) Shall use technology to enhance communication; to design and deliver services; to obtain, manage, and store information; and to demonstrate accountability to students and families in the school setting.

(9) Shall engage in professional development to provide students, families, schools, and communities with the highest-quality, culturally informed services.

(10) Shall ensure that students and their families are provided services within the context of multicultural understanding and competence.

(11) Shall share leadership in developing a positive school climate. They shall also work collaboratively with school administration, school personnel, family members, and community partners to increase accessibility to and effectiveness of all services.

(12) Shall engage in advocacy that seeks to ensure that all students have equal access to education and services to enhance their academic progress.

(13) Shall provide a pivotal role in creating and executing a schoolwide safety plan and provide direct and indirect services that relate to all safety concerns of students, families, and educators. This social work role could be at the school or county level.

(14) Shall be prepared for changes in the needs of the school community they serve and how services will be delivered when a natural disaster, (public) emergency, and/or pandemic occurs.

(15) Shall uphold the confidentiality of the students and families they serve in all formats (verbal, written, and electronic communication) according to federal, state, and local regulations and policies.

COMAR 13A.12 and COMAR 13A.05 School Social Worker regulations
Public Comment Summary – September 5 - October 5, 2026

Name of Organization/Role	Comment	MSDE Response
Alia Ayub Bethesda, MD		MSDE is appreciative of all the supportive comments that have been submitted.
Amanda Eberly, LCSW-C		
Holly Flanagan LCSW-C Maryland School Social Worker of 36 years	School Social Workers have provided critical services to students and their families in the State of Maryland for almost 80 years.	
Kathi Green Supervisor of Student Services - Pupil Services Carroll County Public Schools	It is both critical, and deeply gratifying, to see the scope, professionalism, and impact of School Social Workers reflected in Maryland law. These proposed updates strengthen clarity, reinforce standards, and elevate the visibility of a role that has long been essential to student success.	
Catherine Kennedy, LCSW-C SW in MCPS – position eliminated		
Kristina Kincaid, LCSW-C School Social Worker Thunder Hill Elementary School COMPASS Regional Program		
Lesly Lemus LCSW-C Maryland School Social Worker of 13 years		

Name of Organization/Role	Comment	MSDE Response
Patricia Mustipher, LCSW-C Director of Student Services, Baltimore County Public Schools		
Patricia Roberts-Rose, LCSW-C Clinical Social Worker		
Juli Swissman, LCSW-C		
Danielle Tarvin		
Heidi Taylor, LCSW-C		
Rachel Zimmerman School social worker in Maryland for 8 years		

Name of Organization/Role	Comment	MSDE Response
Dr. Brooke Anthony Assistant Principal Spring Ridge Middle School	School social workers play a key role in reducing chronic absenteeism, improving school climate, supporting crisis response efforts, facilitating family engagement, and helping students develop resilience and coping skills. Their work not only benefits individual students but also strengthens the overall school community. Unfortunately, many schools continue to operate with insufficient social work support, resulting in large caseloads and limited capacity to provide preventative services. When social workers are stretched too thin, students and families often experience delays in receiving the support they need. Investing in additional school social workers is an investment in educational equity and student success. I respectfully urge MSDE to continue prioritizing funding, staffing allocations, and policy initiatives that expand access to qualified social workers in all schools, with particular attention to community schools serving our highest-need populations. Every student deserves access to comprehensive support that addresses both academic and non-academic barriers to learning, and school social workers are essential partners in making that vision a reality.	Salary and staffing is determined at the LEA level Schools and LEAs are required by COMAR 13A.05.05.01 to provide a coordinated program of student support. The proposed regulation adds school social work to the coordinated program of pupil services which includes school counseling, pupil personnel, school psychology and health services.

Name of Organization/Role	Comment	MSDE Response
Alexis Broom, LCSW-C	While excited about School Social Workers being written into the law, I also want to take this opportunity to plead that these positions must be required for all schools. In May of 2026, our school system lost 13 of the 16 school social workers (all but 1 was grant funded). There are currently no budgeted school social workers in St. Mary's County. We are choosing what's most cost effective over human life. This is unacceptable. Our students deserve to be seen as whole individuals - not just academic data points. If mental health and student support are priorities, then funding must reflect that priority — not through reshuffling roles, but through investment that allows every strand of the safety net to remain intact. I beg you to see this, hear this, and fight for this. This is not about protecting positions. It is about protecting students. This conversation is not just about staffing. It is about student safety, student stability, and student success. The needs inside our schools are not shrinking, they are growing exponentially. Our students deserve a system built on stability, not tradeoffs between professionals who are all already stretched thin.	Salary and staffing is determined at the LEA level Schools and LEAs are required by COMAR 13A.05.05.01 to provide a coordinated program of student support. The proposed regulation adds school social work to the coordinated program of pupil services which includes school counseling, pupil personnel, school psychology and health services.

Name of Organization/Role	Comment	MSDE Response
Rebecca (Becky) A. Edwards Records Secretary / Registrar Spring Ridge Middle School (SRMS)	The balance in the school since my children were in school and have graduated if we were to compare then to now, I see greater strides in the ways we are being able to reach out to students in need and get them through their crisis as well as getting the help with ways to cope. Lots of dynamics make the student population in each and every school and the social workers and psychologists always have ways to work with them all. We love our social workers and psychologists. Their workloads are enormous as they are facing the multitude of students each and everyday who need their support, guidance and vast amounts of resources in the school as well as out of the school. They are our "First Responders" to our students and fellow staff	
Jessica Jackson, LCSW-C Parent	Students need and deserve school social workers. Signage in school buildings in no way replaces the important role these safe adults and clinicians play in our students lives. I am in support of the proposed changes to COMAR 13A.05.05	
Shelley Jennings	School Social Workers provide essential services to students and families and that this work deserves to be recognized in Maryland law. School Social Workers are trained to provide holistic approaches to human behavior in the social and educational environment.	

Name of Organization/Role	Comment	MSDE Response
Amy Marshall, LCSW-C Former Social Worker in MCPS	School social workers are vital to student success. They support special education processes, connect families to resources, provide social/emotional intervention to students, support our homeless and foster students, support attendance interventions, and so much more. When I moved to Maryland, I was shocked that school social workers weren't a part of every school district and weren't even required to be in schools. How were the needs social workers support being met? I was also surprised to see that the roles school social workers played were being done by non-social workers and questioned the efficacy of that. Social workers have a unique lens, education, and code of ethics that cannot be replaced by other positions in schools. When I heard that there was finally a proposal to add them to COMAR 13A.05.05, I was thrilled! It is about time school social workers are valued and required to be in schools to best support our families, students, and staff.	Salary and staffing is determined at the LEA level Schools and LEAs are required by COMAR 13A.05.05.01 to provide a coordinated program of student support. The proposed regulation adds school social work to the coordinated program of pupil services which includes school counseling, pupil personnel, school psychology and health services.
Gail Martin, MSW Retired School Social Worker, Baltimore County Public Schools	It was deeply gratifying to see the hard work of my colleagues state-wide being formally codified in Maryland. I would like to personally thank and recognize the support of Mary Gable, John Hummel, and their team for the persistent effort, support, and advocacy that has resulted in this outstanding product.	

Name of Organization/Role	Comment	MSDE Response
Renée Myrie, LCSW-C, LPN Juvenile Court Services Coordinator Circuit Court for Baltimore City Juvenile Justice Center	As a Clinical Social Worker working with incarcerated high-school-aged youth here in Baltimore City, I am writing to express my support for the proposed changes to COMAR 13A.05.05, specifically Section .16, School Social Work Program, as published in the Maryland Register on September 4, 2026. School Social Workers have consistently provided critical services to students and families throughout the State of Maryland for decades. More than 40+ years have passed since these regulations were last substantially addressed, making this an important and long-overdue opportunity to formally recognize and codify the essential work that us School Social Workers perform every day. It is both meaningful and gratifying to see our profession and its contributions to Maryland's students and families more clearly reflected in state regulation and accessible for all to see.	
Mary VanSickle, LCSW-C Retired School Social Worker Garrett County Public Schools	School social workers are an integral part of supporting students' academic success. In addition, they provide numerous supports for students and families facing economic and behavioral health challenges. They are also supportive to school staff who have challenging students.	
Elizabeth Westendorf	I have been a School Social Worker for 22 years and am proud of the resources and services that we provide to Maryland students, families, and staff. It should be noted that all School Social Workers are required to be licensed mental health providers. This is not always true for School Counselors or School Psychologists. Because of this requirement and the extra time and expense required to continue with our license that the other mental health professionals are not required to have, I suggest that School Social Workers receive some sort of bonus or extra to pay to address this need and expertise.	Salary and staffing is determined at the LEA level

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to Proposed Changes to COMAR 13A.05.05

1 message

patricia Roberts-Rose <prroselcswc@gmail.com> Thu, Sep 10, 2026 at 11:29 AM
To: john.hummel@maryland.gov

Good day Mr. Hummel:

I am writing to express my support for the draft changes proposed to COMAR 13A.05.05 that were published in the Maryland Register on 9/4/2026. School Social Workers have provided critical services to students and their families in the State of Maryland for almost 80 years and it is critical—as well as gratifying—that the important work we do be reflected in Maryland law and accessible to all to see.

Thank you for your efforts in putting this forward,

--
Patricia Roberts-Rose, LCSW-C
Clinical Social Worker, Certified Financial Social Worker, Notary State of MD

Your journey starts with us!

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to Support Proposed Changes to COMAR 13A.05.05

1 message

Patricia Mustipher <pmustipher1996@gmail.com> Mon, Sep 14, 2026 at 9:00 AM
To: John Hummel <john.hummel@maryland.gov>

Dear Mr. Hummel,

I am writing to express my strong support for the draft changes proposed to COMAR 13A.05.05 that were published in the Maryland Register on September 4, 2026.

For nearly 80 years, School Social Workers have been a foundational part of Maryland's educational landscape. We serve as licensed mental health professionals who bridge home, school, and community; respond to crises; support attendance and engagement; address barriers to learning; and ensure students and families have equitable access to services. Our work is deeply aligned with MSDE's priorities around student well-being, school safety, and comprehensive multi-tiered systems of support.

It is both critical, and deeply gratifying, to see the scope, professionalism, and impact of School Social Workers reflected in Maryland law. These proposed updates strengthen clarity, reinforce standards, and elevate the visibility of a role that has long been essential to student success.

Thank you for your leadership and for your efforts in putting this forward. Your commitment to advancing student support services across the state is sincerely appreciated.

Sincerely,
Patricia Mustipher, LCSW-C

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to Proposed Changes to COMAR 13A.05.05

1 message

Renee Myrie <renee.myrie@mdcourts.gov> Mon, Sep 21, 2026 at 7:23 PM
To: "john.hummel@maryland.gov" <john.hummel@maryland.gov>

Good evening Mr. John Hummel,

As a Clinical Social Worker working with incarcerated high-school-aged youth here in Baltimore City, I am writing to express my support for the proposed changes to COMAR 13A.05.05, specifically Section .16, School Social Work Program, as published in the Maryland Register on September 4, 2026.

School Social Workers have consistently provided critical services to students and families throughout the State of Maryland for decades. More than 40+ years have passed since these regulations were last substantially addressed, making this an important and *long-overdue* opportunity to formally recognize and codify the essential work that us School Social Workers perform every day.

It is both meaningful and gratifying to see our profession and its contributions to Maryland's students and families more clearly reflected in state regulation and accessible for all to see.

Thank you for your leadership and efforts in moving this important work forward!

Sincerely,

Renée Myrie

Renée Myrie, LCSW-C, LPN
Juvenile Court Services Coordinator
Circuit Court for Baltimore City
Juvenile Justice Center
300 N. Gay Street, Suite B3938
Baltimore, Maryland 21202
Desk: 443.263.2741
DNA Lab: 443.263.2704 or 443-263-2737
LINKS Program: 443-263-3930
Fax: 443.263.2717
Renee.Myrie@mdcourts.gov
Renee.Myrie@baltimorecity.gov
Pronouns [she/her]

Follow us on social media:

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to proposed changes to COMAR 13A.05.05

1 message

Kathi Green <kdgreen21.kg@gmail.com> Mon, Sep 21, 2026 at 1:16 PM
To: "john.hummel@maryland.gov" <john.hummel@maryland.gov>

I am writing to express my support for the draft changes proposed to COMAR 13 A.05.05 that were published in the Maryland register on 9/4/2026. School social workers have provided critical services to students and their families in the state of Maryland for almost 80 years and it is critical as well as gratifying that the important work we do be reflected in Maryland law and accessible to all to see.

Thank you,
Kathi Green

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to Proposed Changes to COMAR 13A.05.05

1 message

Amy Marshall <aemarshall93@gmail.com> Wed, Sep 30, 2026 at 11:00 AM
To: john.hummel@maryland.gov

Good morning,

I wanted to write to you in support for the proposed changes to COMAR 13A.05.05 regarding the role of school social workers. I was a school social worker for 8 years - 5 years in Fairfax County Public Schools in Virginia and 3 years in Montgomery County Public Schools. Unfortunately, my entire social work department in MCPS was eliminated due to budgeting issues. In my time in FCPS, I saw how vital school social workers are. I supported special education processes, connected families to resources, provided social/emotional intervention to students, supported our homeless and foster students, supported attendance interventions, and so much more. I was a vital part of my school communities and school staff saw my value. When I moved to Maryland, I was shocked that school social workers weren't a part of every school district and weren't even required to be in schools. How were the needs social workers support being met? I was also surprised to see that the roles school social workers played were being done by non-social workers and questioned the efficacy of that. Social workers have a unique lens, education, and code of ethics that cannot be replaced by other positions in schools. When I heard that there was finally a proposal to add them to COMAR 13A.05.05, I was thrilled! It is about time school social workers are valued and required to be in schools to best support our families, students, and staff.

Thank you,
Amy Marshall, LCSW-C

Maryland

John Hummel <john.hummel@maryland.gov>

Social Workers in School

1 message

Brooke Anthony <baanthony@smcps.org> Mon, Sep 28, 2026 at 8:29 AM
To: john.hummel@maryland.gov

Good morning,

I am writing as a middle school assistant principal to advocate for increased funding and staffing for school social workers in Maryland's schools, particularly in community schools serving students and families facing significant social, emotional, economic, and mental health challenges.

Throughout my 30 years of experience, schools have become much more than places of academic instruction. Educators are increasingly called upon to address students' mental health needs, family crises, housing instability, food insecurity, trauma, chronic absenteeism, behavioral concerns, and barriers to learning that extend far beyond the classroom. While teachers, counselors, and administrators work diligently to support students, school social workers possess specialized training and expertise that are essential to meeting these growing needs.

In community schools, like mine, the role of a social worker is especially critical. These schools are designed to provide integrated academic, health, social, and family supports to ensure that every student has access to the resources necessary for success. School social workers serve as the bridge between students, families, schools, and community agencies. They connect families to housing assistance, mental health services, healthcare providers, food resources, and other vital supports that directly impact student attendance, engagement, and achievement.

As an assistant principal, I witness daily how unmet social and emotional needs affect students' ability to learn. We do our best to support all students but we are not trained as a social worker. We know that students cannot fully engage in rigorous instruction when they are experiencing anxiety, trauma, family instability, or unmet basic needs. Social workers help identify concerns early, provide interventions, coordinate support services, and work alongside school staff to create conditions where students can thrive academically and emotionally.

Additionally, school social workers play a key role in reducing chronic absenteeism, improving school climate, supporting crisis response efforts, facilitating family engagement, and helping students develop resilience and coping skills. Their work not only benefits individual students but also strengthens the overall school community.

Unfortunately, many schools continue to operate with insufficient social work support, resulting in large caseloads and limited capacity to provide preventative services. When social workers are stretched too thin, students and families often experience delays in receiving the support they need. Investing in additional school social workers is an investment in educational equity and student success.

I respectfully urge MSDE to continue prioritizing funding, staffing allocations, and policy initiatives that expand access to qualified school social workers in all schools, with particular attention to community schools serving our highest-need populations. Every student deserves access to comprehensive support that addresses both academic and non-academic barriers to learning, and school social workers are essential partners in making that vision a reality.

Thank you for your continued commitment to our students and families. I appreciate your consideration of this important issue and your efforts to ensure that all students have the support systems necessary to

succeed.

Sincerely,

Dr. Brooke Anthony

Assistant Principal

Spring Ridge Middle School

The contents of this email and any attachments are intended solely for the use of the named addressee(s) and may contain confidential and/or legally privileged information. Any unauthorized use, copying, disclosure, forwarding, or distribution of the contents of this e-mail is strictly prohibited by the sender and may be unlawful. If you are not the intended recipient, please notify the sender immediately and delete this e-mail.

Maryland

John Hummel <john.hummel@maryland.gov>

Support for changes to comar 13a.05.05

1 message

Rachel Zimmerman <rmariezimmerman@gmail.com> Thu, Sep 17, 2026 at 9:17 AM
To: john.hummel@maryland.gov

Hi Mr. Hummel,

I am emailing because I want to express my support for the draft changes of comar 13a.05.05 that were published in the Maryland register on 9/4/2026. School social workers have provided and will continue to provide critical and necessary support to students and their families in the state of Maryland. We have done so for about 80 years and it is important to have the Maryland law reflect our work.

Thank you!
-Rachel Zimmerman
School social worker in Maryland for 8 years
Sent from my iPhone

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to Proposed Changes to COMAR 13A.05.05

1 message

Catherine Kennedy <catherine.solomon@gmail.com> Fri, Sep 25, 2026 at 8:44 AM
To: john.hummel@maryland.gov

I am writing to express my support for the draft changes proposed to COMAR 13A.05.05 that were published in the Maryland Register on 9/4/2026. School Social Workers have provided critical services to students and their families in the State of Maryland for almost 80 years and it is critical—as well as gratifying—that the important work we do be reflected in Maryland law and accessible to all to see.

Thank you,

Catherine Kennedy, LCSW-C

One of the RIF'ed SWs in MCPS

Maryland

John Hummel <john.hummel@maryland.gov>

COMAR 13A.05.05 support

1 message

Lesly <siomara06@gmail.com> Wed, Sep 16, 2026 at 8:30 AM
To: John.hummel@maryland.gov

Greetings Mr. Hummel,

I am writing to express my support for the draft changes proposed to COMAR 13A.05.05 that were published in the Maryland Register on 9/4/2026. School Social Workers have provided critical services to students and their families in the State of Maryland for almost 80 years and it is critical that the important work we do be reflected in Maryland law and accessible for all to see.

Thank you,
Lesly Lemus LCSW-C
Maryland School Social Worker of 13 years

Maryland

John Hummel <john.hummel@maryland.gov>

Social Workers in the schools

1 message

Rebecca Edwards <raedwards@smcps.org> Thu, Sep 24, 2026 at 5:10 PM
To: john.hummel@maryland.gov

Good Afternoon! I am reaching out as I have observed the positive difference the social workers and psychologists are making in the schools no matter the grade level. We need them and more of them. The balance in the school since my children were in school and have graduated if we were to compare then to now, I see greater strides in the ways we are being able to reach out to students in need and get them through their crisis as well as getting the help with ways to cope. Lots of dynamics make the student population in each and every school and the social workers and psychologists always have ways to work with them all.
We love our social workers and psychologists. Their workloads are enormous as they are facing the multitude of students each and everyday who need their support, guidance and vast amounts of resources in the school as well as out of the school. They are our "First Responders" to our students and fellow staff. Please support them and make their difference count.

Great strides make us show great pride. We are counting on you to Make it Count!

Thank you!
--
Rebecca (Becky) A. Edwards
Records Secretary / Registrar
Spring Ridge Middle School (SRMS)
19856 Three Notch Road
Lexington Park, MD 20653
Phone: 301-863-4031 Option 5
Phone: 301-475-5511 ext 13104
Fax: 301-863-4035
email: raedwards@smcps.org

The contents of this email and any attachments are intended solely for the use of the named addressee(s) and may contain confidential and/or legally privileged information. Any unauthorized use, copying, disclosure, forwarding, or distribution of the contents of this e-mail is strictly prohibited by the sender and may be unlawful. If you are not the intended recipient, please notify the sender immediately and delete this e-mail.

Maryland

John Hummel <john.hummel@maryland.gov>

COMAR 13A.05.05 - School Social Workers

1 message

Alexis Broom <alexismbroom@gmail.com> Sun, Sep 27, 2026 at 6:30 PM
To: john.hummel@maryland.gov

Good evening Mr. Hummel,

My name is Alexis Broom and I am honored to be a social worker in St. Mary's County, Maryland. I have had the privilege of working in the public school system for the past 5 years. I was an intern for 1 year, an Elementary School Social Worker for 3 years, and am currently in my second year as a middle school Community School Coordinator.

I am thrilled that there is consideration for school social workers being written into law. While I am excited about this, I also want to take this opportunity to plead that these positions **must** be required for all schools. In May of 2026, our school system lost 13 of the 16 school social workers (all but 1 was grant funded). There are currently no budgeted school social workers in St. Mary's County.

In Governor Moore's September 2026 Proclamation for Suicide Prevention Month, he states that suicide is the third leading cause of death in young people, ages 10-24, in the state of Maryland (Reference). Statewide and National statistics are screaming that mental health services need to be more universal, but we are not listening. **We are choosing what's most cost effective over human life. This is unacceptable.**

Our students, the young people sitting in every classroom in this state, carry far more than backpacks when they walk through our doors each morning. Many of our students are navigating homelessness, abuse, trauma, anxiety, depression, and overwhelming life stressors — often silently and often alone. When students walk into our buildings, they are not just learners. They are children asking, sometimes without words, “Is there someone here who sees me? Is there someone who can help me?” For many students, that person is their school social worker. Students cannot reach their academic potential if they are struggling to survive emotionally. When we invest in social workers (and mental health supports overall), we are investing in attendance, behavior, achievement, and graduation outcomes — but more importantly, we are investing in whether our students feel safe, valued, and hopeful about their future. **Our students deserve to be seen as whole individuals - not just academic data points.**

There has been a proposal to cut other positions such as Pupil Personnel Workers and School Counselors to be able to budget for School Social Workers. This is not a solution. It is a tradeoff between essential supports that were never designed to replace one another. School Counselors, Pupil Personnel Workers, and School Social Workers serve different functions. Counselors identify early warning signs and keep students connected before problems escalate. Pupil Personnel Workers intervene when attendance, housing instability, court involvement, or family crisis threaten a child’s ability to stay in school. School Social Workers provide therapeutic and crisis support when needs become complex and acute.These roles are **NOT** interchangeable. They are different strands of the same safety net. When one strand is removed, the entire structure weakens. **If mental health and student support are priorities, then funding must reflect that priority — not through reshuffling roles, but through investment that allows every strand of the safety net to remain intact. I beg you to see this, hear this, and fight for this.**

When a School Counselor is responsible for hundreds upon hundreds of students (which already doesn't align with the suggested ratio), children will not be seen early enough. When a Pupil Personnel Worker covers multiple schools, families will not be reached quickly enough. When remaining staff absorb additional caseloads, crisis will escalate before intervention can occur. We will see decreased attendance and academic gains and increased behavioral concerns. **This is not about protecting positions. It is about protecting students.**

While our community agencies and school-based health centers do incredible and essential work, many families face long waitlists, transportation challenges, insurance limitations, or lack of reliable internet access. For many students, school is the only place where support is immediate, consistent, and accessible. School social workers are often the bridge that makes help possible. **This conversation is not just about staffing. It is about student safety, student stability, and student success.**

As a Community School Coordinator, I see daily how barriers outside the classroom directly impact academic performance inside it. Mental health challenges, housing instability, family disruption, and trauma do not disappear because enrollment shifts slightly. **The needs inside our schools are not shrinking, they are growing exponentially.**

Years from now, our students will not remember our budgets, spreadsheets, or policy debates. They will remember whether the adults in charge of their education chose to show up for them, stand up for them, and protect them when it mattered most. **Our students deserve a system built on stability, not tradeoffs between professionals who are all already stretched thin.**

Please do not hesitate to reach out if you have any questions.

Respectfully,

Alexis Broom, LCSW-C

alexismbroom@gmail.com

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to Proposed Changes to COMAR 13A.05.05

1 message

Shelley Jennings <jennings48@comcast.net> Wed, Sep 23, 2026 at 4:27 PM
To: john.hummel@maryland.gov

School Social Workers provide essential services to students and families and that this work deserves to be recognized in Maryland law.
School Social Workers are trained to provide holistic approaches to human behavior in the social and educational environment.
Let us not miss this opportunity for support that it vital.
Shelley Jennings
21207

Maryland

John Hummel <john.hummel@maryland.gov>

proposed social work changes

1 message

Mary Vansickle <mary.vansickle1@maryland.gov> Wed, Sep 16, 2026 at 1:07 PM
To: John Hummel <john.hummel@maryland.gov>

Hi John, hope you are doing well. You probably heard that I retired from GCPS last year and I am now working part-time at the Health Dept. providing therapy at Fv and Rt 40. As you know I was a GCPS social worker for many years and I highly recommend that the Comar proposed changes be approved. School social workers are an integral part of supporting students' academic success. In addition, they provide numerous supports for students and families facing economic and behavioral health challenges. They are also supportive to school staff who have challenging students.
Take care, Mary

NOTICE: This message and the accompanying documents are intended only for the use of the individual or entity to which they are addressed and may contain information that is privileged, or exempt from disclosure under applicable law. If the reader of this email is not the intended recipient, you are hereby notified that you are strictly prohibited from reading, disseminating, distributing, or copying this communication. If you have received this email in error, please notify the sender immediately and destroy the original transmission.

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to Proposed Changes to COMAR 13A.05.05

1 message

Alia Ayub <alia.h.ayub@gmail.com> Wed, Sep 16, 2026 at 7:28 AM
To: john.hummel@maryland.gov

Dear Mr. Hummel,

I am writing to express my support for the draft changes proposed to COMAR 13A.05.05 that were published in the Maryland Register on 9/4/2026.

School Social Workers have provided critical services to students and their families in the State of Maryland for almost 80 years and it is critical that the important work be reflected in Maryland law and accessible for all.

Best wishes,
Alia
(Bethesda, MD 20816)

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to Proposed Changes to COMAR 13.A.05.05

1 message

Juli Swissman <jkirsch22@gmail.com> Wed, Sep 16, 2026 at 9:10 AM
To: "john.hummel@maryland.gov" <john.hummel@maryland.gov>

Hello,

I am writing to express my support for the draft changes proposed to COMAR 13A.05.05 that were published in the Maryland Register on 9/4/26. School social workers have provided critical services to students and their families in the State of Maryland for almost 80 years and it is CRITICAL, as well as gratifying, that the important work be reflected in Maryland law and accessible for all!

Best,
Juli Swissman, LCSW-C

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to Proposed Changes to COMAR 13A.05.05”

1 message

The Westendorf Family <westendorfs@verizon.net> Wed, Sep 23, 2026 at 12:54 PM
To: "john.hummel@maryland.gov" <john.hummel@maryland.gov>

Hello Mr. Hummel,

Sending this email to support School Social Workers and the proposed changes in COMAR 13A.05.05.

I have been a School Social Worker for 22 years and am proud of the resources and services that we provide to Maryland students, families, and staff. I have heard about people in other states being hired as School Social Workers without having the social work credentials or licensing. I do not want to see that happen in Maryland.

It should be noted that all School Social Workers are required to be licensed mental health providers. This is not always true for School Counselors or School Psychologists. Because of this requirement and the extra time and expense required to continue with our license that the other mental health professionals are not required to have, I suggest that School Social Workers receive some sort of bonus or extra to pay to address this need and expertise.

Best Regards,

Elizabeth Westendorf

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to Proposed Changes to COMAR 13A.05.05

1 message

Heidi Taylor <heiditaylorsw@gmail.com> Mon, Oct 5, 2026 at 1:49 PM
To: "john.hummel@maryland.gov" <john.hummel@maryland.gov>

Good afternoon,
I am writing to express my support for the draft changes proposed to COMAR 13A.05.05 that were published in the Maryland Register on 9/4/2026. School Social Workers have provided critical services to students and their families in the State of Maryland for almost 80 years and it is critical—as well as gratifying—that the important work we do be reflected in Maryland law and accessible to all to see.

Thank you for your efforts in putting this forward,

Heidi Taylor, LCSW-C

Maryland

John Hummel <john.hummel@maryland.gov>

Support for Proposed Changes to 13A.05.05

1 message

Kristina Kincaid <Kristina_Kincaid@hcpss.org> Mon, Sep 21, 2026 at 10:01 AM
To: "john.hummel@maryland.gov" <john.hummel@maryland.gov>

Good morning, Mr. Hummel,

I am writing to express my support for the draft changes proposed to COMAR 13A.05.05 which were published in the Maryland Register on 9/4/2026. School Social Workers have provided vital services to students and their families in the State of Maryland for almost 80 years, and it is critical that the important work we do be reflected in Maryland law and accessible for all to see.

Sincerely,

Kristina Kincaid, LCSW-C (she / her / hers)
School Social Worker
kristina_kincaid@hcpss.org
410-313-6922 (x 54542)

Thunder Hill Elementary School · COMPASS Regional Program · 9357 Mellenbrook Road · Columbia, MD 21045 · 410-313-6922 (p) · 410-313-6926 (f)

Should you need immediate assistance with depression, suicidal thoughts, or other serious mental health challenges, please contact:

Grassroots Crisis Intervention – Call 410-531-6677.
Suicide and Crisis Lifeline – Call or text 988.
Crisis Text Line – Text "HOME" to 741741.

Visit CAREAPP to locate services for food, health, housing, transportation, education, employment assistance, and more in the Howard County area.

Maryland

John Hummel <john.hummel@maryland.gov>

13A.05.05

1 message

Jessica Jackson <jessicaellenjackson@gmail.com> Thu, Sep 24, 2026 at 7:35 AM
To: john.hummel@maryland.gov

Good morning,

I am a parent of a public school student, an employee of the public school system, and a LCSW-C.

Students need and deserve school social workers. Signage in school buildings in no way replaces the important role these safe adults and clinicians play in our students lives.

I am in support of the proposed changes to COMAR 13A.05.05.

Schools need social workers.

Jessica Jackson
301-803-0144
Sent from my iPhone

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to Proposed Changes to COMAR 13A.05.05

1 message

Amanda Eberly <amanda.eberly@gmail.com> Wed, Sep 30, 2026 at 10:59 AM
To: john.hummel@maryland.gov

Hello:

I fully support the changes to making school social workers an integrated part of the Maryland school system.

Sincerely,

Amanda Eberly, LCSW-C

Maryland

John Hummel <john.hummel@maryland.gov>

Draft Regulatory Changes COMAR 13A.05.05 & 13A12.04; MD Register 09/04/2026

1 message

Gail Martin <gailmartin2@verizon.net> Mon, Sep 14, 2026 at 12:46 PM
To: John Hummel <john.hummel@maryland.gov>

Dear Members of the Maryland State Board of Education,

As a retired School Social Worker from Baltimore County with over 30 years of service to their students and families, it was deeply gratifying to see the hard work of my colleagues state-wide being formally codified in Maryland. I would like to personally thank and recognize the support of Mary Gable, John Hubble, and their team for the persistent effort, support, and advocacy that has resulted in this outstanding product.

School social workers have been supporting education in Maryland for almost 80 years, starting in 1947 in the Baltimore City Public Schools and since bringing their unique lens to the table with their fellow Pupil Services professionals throughout the State. Children and youth who are among the missing, hungry, tired, or experiencing personal or family trauma struggle to benefit from the hard work of their teachers. We are proud to be a part of optimizing their readiness to learn.

I have no changes to suggest to either of these regulatory proposals and strongly support their finalization as drafted.

Gail Martin, MSW

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to Proposed Changes to COMAR 13A.05.05

1 message

Holly Flanagan <hollyflanagan03@gmail.com> Tue, Sep 15, 2026 at 1:22 PM
To: john.hummel@maryland.gov

Good afternoon Mr. Hummel,

I am writing to express my support for the draft changes proposed to COMAR 13A.05.05 that were published in the Maryland Register on 9/4/2026. School Social Workers have provided critical services to students and their families in the State of Maryland for almost 80 years and it is critical that the important work we do be reflected in Maryland law and accessible to all to see.

Thank you,

Holly Flanagan LCSW-C

Maryland School Social Worker of 36 years

Maryland

John Hummel <john.hummel@maryland.gov>

Comments to Proposed Changes to COMAR 13A.05.05

1 message

Danielle Tarvin <danielletarvin7@gmail.com> Tue, Sep 15, 2026 at 8:10 PM
To: john.hummel@maryland.gov

Hi,

I am writing to express my support for the draft changes proposed to COMAR 13A.05.05 that were published in the Maryland Register on 9/4/2026. School Social Workers have provided critical services to students and their families in the State of Maryland for almost 80 years and it is critical—as well as gratifying—that the important work we do be reflected in Maryland law and accessible to all to see.

Thank you,
Danielle Tarvin