



[combinebh.org](http://combinebh.org)

September 23, 2022

Respectfully submitted to:  
House PBHHS members, House H&I members, Senate HHS members  
Sponsors of revised Mental Health Practice Act

COMBINE represents over 100 Medicaid mental healthcare clinics and providers and advocates for a diverse, sustainable, and competent Medicaid mental healthcare workforce. Currently the IPN (Independent Provider Network) provides more care than all of the CMHC Centers combined.

Two of our members are military veterans who put in hard work to open clinics, and who's livelihoods are now threatened by policy changes. [Read Adrea Nicole Zaleski's letter here.](#) and [read Kim Muhlenbruch's letter here.](#)

We are concerned about new rules proposed by the RAEs and HCPF which will create more restrictions on the workforce during a mental health crisis.

These rules pertain to requirements to act as a clinical or administrative supervisor for university interns or pre-licensure externs.

In the last year, COMBINE worked with Colorado Access, the RAE for Denver and Aurora, to pilot an 'endorsement' process where clinics were approved to allow university interns and pre-licensure externs to provide Medicaid counseling services, which the other RAEs (United Healthcare, Anthem, Beacon) had all allowed.

This endorsement process, which requires production of various supervision policies and procedures, was reasonable, and dozens of clinics expanded their Medicaid services to include Denver and Aurora members.

What was presented to the workforce by HCPF in July was not the same, nor were requested revisions made before the policy was again presented last week. This policy is again under review and will be presented September 29.

Generally we are concerned that the RAEs, both for-profit and nonprofit, are at arms-length from legislative oversight and are given free rein over the counseling workforce.

The revised Colorado [Mental Health Practice Act](#) put in place supervision requirements which are regulated by DORA. These legislated standards included education and practice experience. The state's General Assembly debated and agreed on specific standards.

We are particularly concerned about two changes in the new HCPF/RAE standards:

- Providers may not supervise until they are two years post-licensure.
- Providers may not supervise until two years after a DORA stipulation ended.

Both of these proposed changes will impact the workforce, reducing opportunities for early career counselors to receive supervision, and prohibiting qualified professionals from working.

To illustrate, in Colorado no person can obtain a full counseling license (LPC, LMFT, LCSW) in less than two years, although many candidates take longer. So the proposed standard would only allow workers with more than 4 years experience at minimum.

This is contrary to the will and the letter of the General Assembly, who agreed that supervisors must have,

"Three years OR 3,000 hours post-degree clinical expertise as a counselor;"

There are second career counselors with human service backgrounds who are ready to supervise three years after graduation, which is the legal requirement passed by the General Assembly.

This supervision standard, established by law, is essentially ignored in the proposal by the RAEs and HCPF.

Additionally, DORA's stipulation process, which is a possible result of a grievance, is arduous and complete. Typically three to five years, a provider in this process may be found by DORA to be safe to supervise. The decision properly rests with DORA.

We ask that you contact Cristen Bates, HCPF and the managed care organizations that operate the Medicaid mental health care system.

Cristen Bates, HCPF Medicaid Director  
Kari Snelson, Northeast Health Partners, RAE 2  
Patrick Fox, Anthem (CCHA) RAE 6 & 7  
Megan Taylor, United Healthcare (Rocky Mountain Health Plan) RAE 1  
Dr. Rob Bremer, Colorado Access, RAE 3 & 5

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Here is a sample message:

"Please support the Medicaid members and their providers by aligning your supervision standards with the existing law for experience required to supervise, and please respect DORA's expertise in determining if a conditionally licensed person may supervise."

In regards, the undersigned clinicians and clinic directors:

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