

CBHC BOARD POSITION STATEMENT 23: *Behavioral Health Workforce Development*

Position Statement

Colorado must actively pursue comprehensive strategies to achieve a robust and sustainable behavioral health workforce capable of meeting the needs of every community.

Background

Nationwide shortages in the behavioral health workforce are raising broad concerns about the healthcare system's ability to meet the growing demand and need for behavioral health treatment and services. Colorado is not alone in facing considerable challenges in its behavioral health workforce.

Nationally, behavioral health providers are identifying:

- Difficulties in recruiting and retaining employees
- Absence of career ladders for employees
- Marginal wages and benefits
- Limited access to relevant and effective training
- Erosion of supervision
- Financing systems that place enormous burdens on the workforce to meet high levels of demand with inadequate resources¹

In addition, large hospital systems and health plans are luring licensed clinicians away from the community mental health system with better pay, better benefits, more workplace protections, and less administrative burden. Various national and state level reports have identified shortages in healthcare capacity to meet demand which "can be attributed to both insufficient numbers and maldistribution of workers, leaving some communities with no behavioral health providers."² In Colorado, for example, 57 of the 64 counties are identified as Health Professional Shortage Areas (HPSAs) for mental health practitioners.^{3,4}

In 2019, CBHC commissioned the support of an external consulting group, TBD Solutions, to better define the workforce challenges facing the membership. In their work, they identified issues including inconsistent data, high turnover rates, and recruitment and retention challenges relating to low salaries, stressful workplace conditions, and rigid regulatory structures. These are often only partial priorities for policy makers as they examine multi-faceted workforce solutions.

In Fiscal Year 2020, CBHC conducted a comparison analysis for CMHC staff and state employees and found consistent disparities by profession type. For example, psychologists were paid 26% higher in the state system than in the community mental health system. These findings align with SAMHSA reports to congress which highlight disparities that contribute to behavioral health workforce shortages, including

the stigma and discrimination that mental health clinicians face which may result in recruitment difficulties or lower pay.

Strategies between rural, frontier, and urban communities must be salient to meet the unique challenges that face every region. Lack of data on workforce retention efforts, and the need for varying strategies make it difficult to pinpoint exact roadmaps to enhancing the behavioral health workforce. In SAMHSA's 2013 report to congress, incentive programs (such as loan repayments and forgiveness), competitive salaries, anti-stigma campaigns (especially regarding understanding of addiction as disease), and adequate career progress rewards (e.g., recognition, promotions, and continuing education) are all listed as common and promising workforce strategies across the nation.

CBHC members have long leveraged their community-responsive strategies to implement recruitment strategies that support both emerging and seasoned clinicians in sustaining a career in behavioral health service delivery. Mental health centers utilize competitive benefit packages when possible and maintain eligibility for loan forgiveness programs to support the workforce in light of historically low salaries and stressful environments. Policies and funding structures create barriers in allowing providers to maximize their creativity to design recruitment and retention programs that can help compete with for-profit sector opportunities.

Beyond fiscal and personal challenges, Colorado's behavioral health workforce is hindered by overly strict regulations that create hardships for individuals who want to enter the field, require extensive and burdensome administrative efforts, create silos in the workforce, and reduce the communities' ability to utilize providers to their full potential. CBHC members are committed to advocating on behalf of our communities for state-wide initiatives that help the behavioral health workforce thrive and grow with the rest of Colorado's booming economy. In January of 2020, TBD Solutions partnered with CBHC to create a white paper with comprehensive strategies to address Colorado's workforce shortages. The project included internal and operational recommendations for CMHCs to consider, opportunities to leverage community relations and partnerships, as well as promising policy initiatives which Colorado must pursue, such as:

- Increasing inclusivity of potential workforce, especially for individuals with criminal backgrounds
- Examining and expanding the scope of practice for various professionals' types within the behavioral health system
- Statutorily directed wage increases or wage minimums, alongside state rate increases
- Enhancing employee benefits
- Addressing excessive administrative burden by reducing duplicate paperwork, eliminating unnecessary reporting and documentation, and supporting providers through training reciprocity, deemed status for licensed or accredited programs, and uniformity of standards across departments

In 2020, the COVID-19 pandemic further exacerbated the workforce shortages experienced in Colorado due to widely increased demand for behavioral health services, widespread cuts in the safety net system, and other impacts of the pandemic and related recession. Regulatory flexibilities were introduced to enhance access to care during the pandemic, particularly around the use of telehealth which presents new strategies to expand workforce capacity. More than ever, it is imperative that Colorado pursue comprehensive strategies to strengthen and enhance the behavioral health workforce to ensure that needed care is available for all Coloradans in every community.

Policy Priorities

23.1 Comprehensive Recruitment and Retention Strategies

To truly begin addressing Colorado's behavioral health workforce needs, diverse and comprehensive strategies must be pursued that leverage opportunities for financial support as well as creating locally responsive solutions to support emerging and seasoned clinicians and other staff working within Colorado's safety-net system.

- ❖ CBHC supports policies, funding reform, and regulations that provide behavioral health providers with the flexibility to pursue various strategies towards recruitment and retention.
 - Prioritizing the non-profit workforce for financial support programs such as student loan forgiveness, tuition assistance, and other financial aid for education advancement or licensure.
 - Enhancing the ability of community-based organizations to offer competitive benefits packages, including paid leave, relocation assistance and other employment incentives.
 - Supporting creative strategies to augment salaries with robust benefits packages and flexible reimbursement models that allow for workforce reinvestment.
 - Ensuring flexible regulations that allow Colorado's safety net providers to recruit, employ, and retain providers across state lines, including via telehealth.

23.2 Inclusive Policies

Colorado's behavioral health workforce benefits tremendously from inclusion of individuals who have personal lived experience with behavioral health disorders and the healthcare system.

- ❖ CBHC supports policies that enhance the roles of peers and individuals with lived experience in the behavioral health workforce.
 - Creating alignment and formalizing the roles of peers in healthcare delivery to allow for more peer involvement.
 - Reducing discriminatory practices that create barriers for individuals with lived experience from gaining licensure or gainful employment in the behavioral healthcare delivery system, including for the provision of SUD services.
- ❖ CBHC supports policies that promote a diverse workforce and encourage leadership opportunities in behavioral health for professionals of color and other underrepresented communities
 - Increasing the ability of Colorado's safety net to proactively outreach, recruit, and retain professionals from underrepresented communities.
 - Creating meaningful career advancement opportunities for professionals with diverse backgrounds
 - Ensuring cultural competency and implicit bias trainings and standards throughout the organization, including for leadership and hiring managers.
- ❖ CBHC supports policies that reduce barriers to employment in the behavioral healthcare delivery system.
 - Promote open state reciprocity to encourage out of state clinicians to fill open positions.
 - Enhance and streamline telehealth regulations to fill workforce shortage areas while maintaining connections to local levels of care.

- Create opportunities to assist emerging clinicians through the costly, complicated, and lengthy licensure process, while working to simplify the process where appropriate.

23.3 Financial Strategies to Support the Behavioral Health Workforce

Colorado's safety net providers often face difficulties in competing with large, out of state, for-profit systems, as well as other industries, that can offer higher pay to skilled workforce. If Colorado hopes to continue to comprehensively serve the most vulnerable individuals in our state, community providers must be empowered to support their staff.

- ❖ CBHC supports policies and legislation to increase the community behavioral health system's purchasing power and ability to pay competitive salaries and offer robust benefits packages.
 - Ensuring reimbursement rates and payment methodologies allow for annual cost of living adjustments for community providers to align with Colorado's economy at large.
 - Allowing flexibility in funding mechanisms so that providers can prioritize supporting staff with the understanding that a healthy and secure workforce yields best clinical outcomes.
 - Increasing reimbursement parity across public and private health plans to allow behavioral health providers to pay salaries comparable to primary care providers.
 - Setting minimum salary expectations in statute and ensuring adequate resources for the safety net behavioral health system to meet them.

23.4 Aligned Education, Training, and Professional Policies

Across Colorado, there are multiple pathways to gain proper education and pursue licensure in the behavioral health field. However, certain population specialties and licensure types exist in silos. Too often, impractical regulations and policy decisions create limits in clinicians' abilities to practice to the full scope of their licensure. Further, silos in professional policies create inconsistencies for individuals that treat diverse individuals presenting with complex concerns.

- ❖ CBHC supports policies that enhance the behavioral health workforce ability to practice to its full potential.
 - Supporting masters' level and higher clinicians in dedicating a majority of their time on clinical services appropriate with their licensure level rather than administrative or other tasks.
 - Creating alignment between professional board policies to promote uniformity in professional standards regarding the delivery of care and telehealth services.
 - Modernizing coverage and billing policies across all state departments to ensure that services are being delivered by clinically appropriate level of professionals.
- ❖ CBHC supports the leveraging of technology to increase the clinical capacity of Colorado's safety net behavioral healthcare workforce.
 - Minimizing administrative burden and non-clinical time through technology solutions.
 - Enhancing the scope and availability of telehealth solutions within local safety-net systems.
- ❖ CBHC supports policies that expand reimbursement opportunities for services provided by licensed professional counselors and licensed marriage and family therapists within Medicare and private insurance.

Citations:

1. An action plan for behavioral health workforce development. SAMHSA. (2013).
2. Beck, A. (2018). Improving Data for Behavioral Health Workforce Planning: Development of a Minimum Data Set. *American Journal of Preventive Medicine*, 54(6), S192–S198.
3. Quick maps-mental health professional shortage areas. HRSA. (2019). Retrieved from <https://data.hrsa.gov/maps/quick-maps?config=mapconfig/HPSAMH.json>
4. The SUD map created by PCO also provides a compelling graphic of the service shortage, with the highest need identified in most of rural Colorado.
<https://cdphe.maps.arcgis.com/apps/SimpleViewer/index.html?appid=9f17f6155cde42aab58b0ccf65a179d5>

Effective Period

The Colorado Behavioral Healthcare Council (CBHC) Board of Directors approved this policy on 04/19/2018. It is reviewed as required by the Public Policy Advisory Committee.

Policy Updated

Updates to this policy position were approved by the CBHC Board of Directors on 10/6/20.

Expiration: 10/6/2022.