

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

Position Statement

CBHC supports comprehensive strategies to develop a healthy and diverse behavioral health safety net workforce.

Background

Nationwide shortages in the behavioral health workforce are raising concerns about the healthcare system's ability to meet the growing demand for behavioral health services.¹ Colorado is not alone in facing considerable challenges in its safety net behavioral health workforce. Nationally, behavioral health providers are identifying these challenges:

- Difficulties in recruiting and retaining employees, including recruiting a diverse workforce
- Ability to offer competitive wages and benefits
- Limited access to high-quality training and supervision
- Financing systems that place enormous burdens on the workforce to meet high levels of demand with inadequate resources²
- Absence of career ladders for employees
- Increased employee stress related to the COVID-19 pandemic

Before the pandemic, CBHC member surveys identified hospital systems, community health clinics, and health plans as the destination of choice for licensed clinicians leaving the community mental health system. Better pay, better benefits, more workplace protections, and less administrative burden are some of the benefits that these entities can provide. Post-pandemic, however, the destination of choice has become private practice (cash pay) and large national telehealth companies. In addition to the factors listed above, flexibility and the ability to work from home are driving factors. 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."³ In Colorado, for example, 57 of the 64 counties are identified as Health Professional Shortage Areas (HPSAs) for mental health practitioners.^{4,5}

¹ https://go.thenationalcouncil.org/NzczLU1KRi0zNzkAAAGFtpj4I-2ThSAiSLJ5LN2VnmgVuhjmbigDj13WmEHVF-eEH3rxhbiTF775x7cHjLJ_LGPNc=

² An action plan for behavioral health workforce development. SAMHSA. (2013)

³ <https://pubmed.ncbi.nlm.nih.gov/29779542/>

⁴ Quick maps-mental health professional shortage areas. HRSA. (2019). Retrieved from <https://data.hrsa.gov/maps/quick-maps?config=mapconfig/HPSAMH.json>

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.⁶ 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.

National and state strategies must be broad enough or flexible enough to address the unique challenge that face rural, frontier, and urban communities. In Common and promising workforce strategies described in SAMHSA's 2013 report to congress include:

- Incentive programs (such as loan repayments and forgiveness)
- Competitive salaries
- Anti-stigma campaigns (especially regarding understanding of addiction as disease)
- Adequate career progress rewards (e.g., recognition, promotions, and continuing education)

CBHC members have long leveraged local strategies to implement recruitment strategies that support both emerging and seasoned clinicians in sustaining a career in Colorado's behavioral health safety net. Community mental health centers utilize competitive benefit packages when possible and maintain eligibility for loan forgiveness programs to support the workforce to counter lower salaries and more stressful environments when compared to the for-profit sector. Complex funding structures and incongruent policies across public payer sources can create barriers for providers working to maximize their creativity to design recruitment and retention programs that can help compete with for-profit sector opportunities.

Colorado's safety net behavioral health workforce, like many other publicly funded systems, is also hindered by overly strict regulations that create hardships for individuals who want to enter the field, requires extensive administrative efforts, creates silos in the workforce, and reduces providers' ability to utilize their clinical workforce to their full potential. CBHC members support 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 the following promising policy initiatives:

- Increase inclusivity of the potential workforce, especially for individuals with criminal backgrounds

⁵ 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>

⁶ <https://www.cbhc.org/workforce-advocacy/>

- Examine and expand the scope of practice for various professional types within the behavioral health system
- Direct, through statute or budget, wage increases or wage minimums, to keep pace with state employee rate increases
- Enhance employee benefits
- Address excessive administrative burden by:
 - Reducing duplicate paperwork
 - Eliminating unnecessary reporting and documentation
 - Supporting providers through training reciprocity, deemed status for licensed or accredited programs
 - Developing uniform of standards across departments and by public payer source

Beginning 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 opportunities to expand workforce capacity.

During the 2022 legislative session, the General Assembly passed SB22-181⁷, which committed \$72M in funds from the American Rescue Plan Act towards addressing Colorado’s workforce crisis. In addition to the policy recommendations, the legislation required the Behavioral Health Administration to develop a report to spend the \$37M that the bill appropriates for that purpose.⁸

The state will rely on this report in the coming years to strengthen Colorado’s behavioral health workforce. 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 and 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.

⁷ <https://leg.colorado.gov/bills/sb22-181>

⁸ <https://bha.colorado.gov/resources/workforce-development>

- Supporting creative strategies to enhance salaries with strong benefits packages.
- Supporting flexible reimbursement models that allow for workforce reinvestment.
- Ensuring reciprocity agreements or interstate compacts that allow Colorado’s safety net providers to recruit, employ, and retain providers across state lines.

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 reduce barriers to employment in the behavioral healthcare delivery system, including policies that:
 - Promote open state reciprocity to encourage out of state clinicians to fill open positions.
 - Create national or regional licensure compacts that recognize licensing standards from other states.
 - Enhance and streamline telehealth regulations to fill workforce shortage areas while requiring out-of-state telehealth providers to demonstrate partnerships with local, brick-and-mortar providers.
 - Create opportunities to assist emerging clinicians through the costly, complicated, and lengthy licensure process, while working to simplify the process where appropriate.
 - Create more opportunities, including new professional categories, for unlicensed professionals to participate in behavioral health service delivery.

23.3 Increasing and Elevating Diversity in Colorado’s Behavioral Health Safety Net Workforce

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.
- Fostering opportunities to elevate diverse voices working in Colorado’s behavioral health system.
- Creating meaningful career advancement opportunities for professionals with diverse backgrounds.
- Ensuring cultural competency and implicit bias trainings and standards throughout provider organizations, including for executive leaders, and hiring managers.
- Developing proactive strategies (e.g., those included in SB22-181) that strive to attract a more diverse population into the profession, including tuition scholarships and commitments.
- Working to expand roles for people with non-graduate degrees.

- Developing mentorship opportunities within and between provider organizations for staff representing and serving underserved populations.

23.4 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 purchasing power, including the ability to pay competitive salaries and benefits, for state-contracted safety net providers. We support policies that:
 - Ensure reimbursement rates and payment methodologies allow for annual cost of living adjustments for community providers to align with Colorado’s economy at large.
 - Allow flexibility in funding mechanisms so that providers can prioritize supporting staff with the understanding that a healthy and secure workforce yields best clinical outcomes.
 - Increase reimbursement parity across public and private health plans to allow behavioral health providers to pay salaries comparable to primary care providers.
 - Set minimum salary expectations in statute and ensuring adequate resources for the safety net behavioral health system to meet them.

23.5 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 limit a clinician’s ability to practice to the full scope of their licensure. Further, incongruent policies by payer type create inconsistencies for clinicians that treat individuals presenting with complex concerns.

- ❖ CBHC supports policies that enhance the ability of the behavioral health workforce to practice to its full potential.
 - Supporting licensed clinicians in dedicating a majority of their time on clinical services appropriate with their licensure level rather than administrative 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 federal policy reform that creates reimbursement opportunities for services provided by licensed professional counselors and licensed marriage and family therapists within the Medicare program.

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.