

Janet T. Mills
Governor

Jeanne M. Lambrew, Ph.D.
Commissioner



Maine Department of Health and Human Services
Office of MaineCare Services
11 State House Station
Augusta, Maine 04333-0011
Tel; (207) 287-2674; Fax (207) 287-2675
TTY: Dial 711 (Maine Relay)

April 10, 2023

Senator Joseph Baldacci, Chair
Representative Michelle Meyer, Chair
Members, Joint Standing Committee on Health and Human Services
100 State House Station
Augusta, ME 04333-0100

Re: LD 997 – *Resolve, to Reduce Workforce Barriers for Mental Health Professionals in Maine*

Senator Baldacci, Representative Meyer, and Members of the Joint Standing Committee on Health and Human Services:

This letter is to provide information on LD 997, *Resolve, to Reduce Workforce Barriers for Mental Health Professionals in Maine*. This resolve changes the educational requirements for behavioral health professionals (BHPs) providing services for children to a minimum of 60 credit hours in a related field, 90 credit hours in an unrelated field or a high school diploma or equivalent with training and oversight as determined by the Department. It requires the Department to amend or establish contracts for training BHPs to train individuals within existing resources and authorizes the Department to opt to charge individuals or their employers fees for training.

The resolve also requires the Department to amend its guidelines regarding certification for mental health rehabilitation technician/community technicians (MHRT/Cs) so that an individual who has completed a 4-year postsecondary educational degree program in a mental health related field or a graduate degree in a mental health-related field does not have to meet all 8 competency domains in the training contracted from the department as long as the individual has met the 3 priority domains.

This bill reflects what is in practice in MaineCare policy today; however, exact wording varies across sections of policy. Section 97, *Private Non-Medical Institution Services*, and Section 28, *Rehabilitative and Community Support Services for Children with Cognitive Impairments and Functional Limitations*, requires a high school diploma and specialized training (which means BHP certification). There is a three-year experience requirement with the HS diploma in Section 65, but that will change to align with other sections with an already-planned rulemaking. The BHP qualification criteria will soon become consistent across all of these services.

It is unclear if the intent of this bill is inclusive of education and training requirements for BHPs providing specialized services. It is the intent of the Department to continue to require additional training for BHPs providing specialized services in alignment with evidenced-based models.

The Office of Behavioral Health (OBH) has been working to reduce barriers, including streamlining the certification pathways for the Mental Health Rehabilitation Technician/

Community (MHRT/C). The policy released on November 1, 2021 in response to Resolves 2021, Ch. 69, outlined three certification pathways: (A) a pathway for an approved academic program; (B) a pathway for a four-year or higher social services-related degree or full LSW; and (C) a pathway to provisional certification.

LD 997 as it is written creates a barrier (perhaps unintentionally) to MHRT/C certification that currently does not exist.

Currently, applicants with a four-year or higher related degree can apply using Pathway B: they will be given full certification immediately and have two years to complete any remaining learning domains. They must renew their certification every two years thereafter. LD 997 would require Pathway B applicants to complete the three priority domains (1-3) before they could be certified; had this restriction been in place between November 1, 2021, and March 8, 2023, only 60 of the 265 individuals who qualified under Pathway B would have been certified. This proposed requirement increases rather than reduces barriers to employment.

There is flexibility in the current program. MHRT/Cs in this Pathway B category are given two years to complete missing learning domains while employed. If an individual is missing domains in their degree, there is a Credit for Work Experience option that they can use to demonstrate a working knowledge of the required domain competencies in lieu of additional coursework. For example, an individual could meet up to four domains with a full year of work experience and by submitting the application on which their supervisor verifies the individual staff member's working knowledge of those domain competencies. Eighty percent (80%) of Pathway B applicants are utilizing the Credit for Work Experience option to complete at least some of their missing domains. Every applicant's transcript is thoroughly reviewed by Muskie Center for Learning, OBH's service partner for mental health certifications, and every effort is made to grant applicants maximum credit (including partial domain credit) and provide suggestions for completing the missing domains.

LD 997 proposes that individuals with a mental health-related degree must complete only the first three (3) domains and not the full eight (8) competency domains of the MHRT/C. Without these five (5) competency domains, individuals may not be adequately prepared to address the complexities of this work.

- Domain 4 (Trauma and Resiliency) and Domain 6 (Mind – Body Connection) are particularly relevant and important for working with individuals with co-occurring SUD
- Domain 5 (Policy Knowledge) addresses Maine-specific policies and ensures that workers have awareness of relevant regulations and how to support individuals in effective self-advocacy within the health and human services system.
- Domain 7 (Cultural Competency) ensures staff have the needed knowledge and awareness to work with increasingly diverse populations.
- Domain 8 (Vocational Supports) gives MHRT/Cs the knowledge needed to assist individuals in goal-directed employment activity. Employment is a valuable part of recovery for individuals.

The eight (8) competency domains were established after years-long engagement with stakeholder groups including providers, service recipients, academics, community members, and

the Department. A competencies sub-committee was formed to categorize and clarify competencies within each domain. The first three domains are considered priorities for an individual to provide services as outlined in Chapter II, Section 17, Community Support Services and Section 65, Behavioral Health Services.

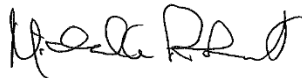
The flexibility of the multiple pathways to MHRT/C certification may appear complicated; however, they exist to accommodate as many individuals as possible entering the field. OBH is committed to exploring how to clarify the process and to support individuals in navigating the certification process.

The MHRT-C language in the bill is also confusing. The most recent update to the MHRT/C certification program occurred on November 1, 2021, when the Maine Office of Behavioral Health released a policy whereby there are two pathways to full certification: an approved academic program, or a four- year or higher social services- related degree or a full LSW; and one pathway to provisional certification.

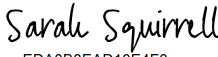
In summary, the proposed bill creates an additional barrier for individuals with related degrees who are seeking MHRT/C certification to start work by implementing a requirement that they meet the Priority Domains prior to being able to be certified and beginning work.

We wanted you to be aware of the above information as you consider this bill going forward. If you have any further questions, please feel free to contact me.

Sincerely,



Michelle Probert
Director
MaineCare Services

DocuSigned by:

EDA0B8EAD10E4F0...

Sarah Squirrell
Director
Office of Behavioral Health