



Committee Chair Jennifer Schultz and Human Services Finance and Policy Committee Members:

Re: HF2127

April 7, 2021

Thank you to this committee for its work in putting together an amazing bill in HF 2127. The Minnesota Psychological Association wishes to point your attention to an area of the bill whose implications are quite concerning but do not appear obvious from a review of the bill language. The concern is with one aspect of the Universal Services Standards that was changed subsequent to the bill being heard in the House and being slated for inclusion in the omnibus bill.

Community Mental Health Centers (CMHCs) provide care to the most vulnerable of Minnesotans. The changes at 404.31 are significant in that they would do away with the provision of supervision of these centers by doctoral level providers, psychologists and psychiatrists (*See 256B.0625, subd.5(b)*). Without adequate oversight, we are concerned that the individuals receiving care from CMHCs will be receiving less than optimal, second-rate services. CMHCs are designed to be multidisciplinary teams so that the best, most informed, care is provided. While language regarding this removal of professional oversight to CMHCs may appear in an amendment to be proposed, these changes are simply not sufficient to safeguard the well-being of the most vulnerable with the most complex needs. We ask that you include language reflecting that supervision of CMHCs by doctoral providers, either a psychologist licensed for independent practice at the doctoral level or a board certified or eligible psychiatrist, should be a requirement in order to ensure the safety and quality of care for individuals. Moreover, it is important to assure that the nature of the oversight by these professionals be defined and not left to the CMHCs to articulate. We are happy to assist with any changes.

Sincerely,  
Jordan Robinson, PhD, LP, ABPP-CN  
President  
Minnesota Psychological Association

Trisha A. Stark, PhD, LP, MPA, MJ  
Legislative chair and Federal Advocacy Coordinator  
Minnesota Psychological Association