



Representatives Koegel and O'Driscoll, Co-Chairs
Commerce Finance and Policy
March 18, 2026

Co-Chairs Koegel and O'Driscoll and Commerce Finance and Policy Committee Members,

On behalf of the National Association of Social Workers, MN Chapter (NASW - MN) and the MN Society for Clinical Social Work (Clinical Society), we are writing in support of HF3904, a bill that establishes reimbursement eligibility and parity for clinical trainees providing mental health services.

Clinical social workers (LICSW) make up the largest group of mental health providers in Minnesota. NASW - MN is the largest membership organization of professional social workers in our state, representing nearly 2000 social workers, and the Clinical Society is a professional group that advances the practice of clinical social work in Minnesota. Collectively, our organizations offer experience and expertise in mental health practice.

Clinical trainees are an important part of the mental health provider continuum, particularly in Greater Minnesota. Authorized per MN Statute 245I.04, Subd. 6, these professionals have completed or are enrolled in an accredited graduate program and are fulfilling supervised practice requirements for independent licensure. Practicing under clinical supervision, they increase access for clients and build a pipeline of providers.

Yet, Optum has indicated that care delivered by clinical trainees are not eligible for reimbursement under its commercial plans without a specific contract addendum. While some providers hold older authorizations, these permits are currently unavailable to new applicants. No other major insurance carrier in Minnesota requires this type of specialized authorization for clinical trainee reimbursement.

HF3904 provides statutory clarity to ensure uniformity in insurance reimbursement, fostering consistency for both providers and the clients they serve. Four other states (CA, CO, IA, MA) have taken this step.

By passing HF3904, Minnesota can protect the provider pipeline and ensure that access to mental health services is not dictated by an arbitrary billing requirement from a single carrier. We urge your support.

Thank you for your leadership and for your commitment to Minnesota's mental health continuum.

Sincerely,

A handwritten signature in black ink that reads "Karen E. Goodenough". The signature is written in a cursive, flowing style.

Karen E. Goodenough, PhD, LGSW
Executive Director
NASW-MN

A handwritten signature in black ink that reads "James Stolz, LICSW, LADC". The signature is written in a cursive, flowing style.

James Stolz, LICSW, LADC
Legislative Committee
Clinical Society