



ASSOCIATION  
FOR BEHAVIORAL  
HEALTHCARE



MASSACHUSETTS CHAPTER



MASSACHUSETTS  
Health & Hospital  
ASSOCIATION



health law **advocates**  
Lawyers Fighting for Health Care Justice



Massachusetts Association  
of Behavioral Health Systems

December 27, 2018

Undersecretary John Chapman  
Office of Consumer Affairs & Business Regulation  
501 Boylston Street, Suite 5100  
Boston, MA 02116

Dear Undersecretary Chapman:

We are writing as a coalition of mental health and addiction provider organizations and groups to request your support of additional funding for the Division of Professional Licensure as the Baker Administration develops your Fiscal Year 2020 budget.

We greatly appreciate the administration's commitment to increasing access to mental health and addiction treatment services across the Commonwealth, however, there is still more work to be done to ensure that residents of the Commonwealth have unfettered access to behavioral health services. The opioid epidemic is taking the lives of five Massachusetts residents a day.<sup>1</sup> Recent data from SAMHSA shows that 54% of adolescents in Massachusetts aged 12-17 did not receive treatment for their depression, and 45% of adults did not receive services.<sup>2</sup>

The lack of adequate staffing for the Board of Registration of Allied Mental Health and Human Services Professions, Board of Registration of Psychologists and Board of Registration of Social Workers has caused confusion and long delays for professionals seeking their licenses to practice. These long waits directly impact access to critical mental health and addiction treatment services for adults, kids and families across the Commonwealth.

We have heard from many individuals who have waited months, even years from the time they passed their final licensure exam to when their license was issued. The barriers to licensure included (1) multiple correction requests from the Board communicated separately instead of as one bundle, (2) lack of direction about how to communicate specific requests to the board (response requested via mail then via email) that add months to the licensure process, (3) months

<sup>1</sup> <https://www.mass.gov/files/documents/2018/11/16/Opioid-related-Overdose-Deaths-among-MA-Residents-November-2018.pdf>

<sup>2</sup> <https://store.samhsa.gov/system/files/sma17-barous-16-ma.pdf>

without any communication from the board on status of applications and (4) current communications that the standard wait time for applicants is 150 days.

We are also very concerned about the impact of inadequate staffing on one of the Boards' most important functions, which is to protect consumers by providing timely responses to complaints and questions by both licensed providers and members of the public. Currently, inadequate staffing results in phone calls and emails going unanswered for long periods of time, and it is not uncommon for voicemail boxes to be consistently full so that no phone messages can be left. Such circumstances make it extremely difficult for licensing boards to monitor their licensed professionals and ensure compliance with state licensing laws.

We believe there is an urgent need to commit additional staffing resources to support the boards of registration in their important work. We would welcome the opportunity to discuss these needs further if it is helpful to you. Please contact Mandy Gilman ([agilman@abhmass.org](mailto:agilman@abhmass.org)) at the Association for Behavioral Healthcare.

Sincerely,

Association for Behavioral Healthcare  
Health Law Advocates  
Massachusetts Association of Behavioral Health Systems  
Massachusetts Association of Mental Health Counselors  
Massachusetts Health & Hospital Association  
Massachusetts Psychological Association  
National Association of Social Workers, MA Chapter  
New England Association for Family & Systematic Therapy

Cc: Secretary Marylou Sudders, Executive Office of Health and Human Services  
Commissioner Joan Mikula, Department of Mental Health  
Commissioner Monica Bharel, Department of Public Health