Senator Klein, Chair
Commerce and Consumer Protection
April 16, 2026

Chair Klein and 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 the delete-all amendment to SF4365. In particular, Article 6, section 7 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 a vital link in the mental health provider continuum, particularly in Greater Minnesota. Authorized under 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. By practicing under clinical supervision, they both increase immediate access for clients and build the long-term pipeline of independent providers.

Yet, Optum has indicated that care delivered by clinical trainees is 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.

The provision included in the SF4365 amendment 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 Article 6, Section 7, 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,

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

James Stolz, LICSW, LADC
Legislative Committee
Clinical Society