The Commonwealth of Massachusetts
HEALTH POLICY COMMISSION
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November 5, 2026

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State House
Boston, MA 02133

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Clerk of the Senate
24 Beacon Street, Room 335
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Dear Clerks of the Massachusetts House and Senate,

Pursuant to Chapter 28 of the Acts of 2023, I am pleased to share the Massachusetts Health Policy Commission's (HPC) Behavioral Health Workforce Center (BHWC) recently published report, *Strengthening the Behavioral Health Workforce: Pathways to Licensure and Opportunities for Reform*. As directed by the Legislature and in collaboration with the Executive Office of Health and Human Services (EOHHS) and the Department of Public Health (DPH), the BHWC examined pathways to behavioral health (BH) licensure in the Commonwealth and identified opportunities to strengthen and grow the BH workforce. The following **key findings** are outlined in the accompanying report:

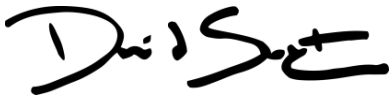
- The Commonwealth's graduate-level BH workforce is primarily comprised of individuals between the ages of 25 and 54. However, **more than 25% of the current BH workforce is at or within ten years of retirement age**.
- The BH workforce experienced workplace shifts and uneven employment growth across professions in recent years, including an **increase in employed psychologists and counselors and a reduction in employed social workers in health and human services organizations and agencies.** The decrease in employed social workers in these settings may indicate a shift to other employment settings, such as small private practices, gaining employment outside of the behavioral health field, self-employment, or retirement.
- The BH field is faced with a shortage of qualified, available clinical supervisors.
- Numerous practical and equity-related concerns have been raised about statutes and regulations requiring **master's-prepared social workers to pass the Association of Social Work Boards (ASWB) Master's Exam prior to applying for the non-independent Licensed Certified Social Worker (LCSW) license**.
- While BH licensure processing times have improved since 2023, license-seeking providers still report that the process can be extremely complex and time consuming, with **certain license types demonstrating long initial licensure application review times**.
- Finally, this report and other reports from the field suggest that **persistent barriers are likely negatively impacting BH providers and trainees from historically underrepresented communities.**

Policy recommendations include:

- The Massachusetts Legislature should **invest in efforts to sustain and expand state funding to support clinical supervision** programs.
- The Massachusetts Department of Public Health (DPH) should **consider updating social work licensure regulations to enable LCSWs pursuing independent licensure to receive cross-discipline supervision for up to fifty percent of required hours** by expanding the definition of acceptable independently licensed clinical supervisors.
- The Massachusetts Board of Registration of Social Workers and DPH should **consider updating licensure regulations to temporarily remove the ASWB Masters Exam requirement from the LCSW application process** for a trial period of four years and evaluate the subsequent impact on size, quality, and makeup of the BH workforce for use in consideration of future requirements.
- The Legislature should **invest new funding to waive licensure fees for all BH provider types working in community-based settings**, including allied mental health professionals, to reduce barriers for early career practitioners. The Commonwealth should identify a new funding source to sustain licensure fee waivers through June 2030.
- The Massachusetts Legislature should **invest in efforts to support expedited processing of BH initial licensure applications.**
- The Massachusetts Department of Public Health should **consider updating social work licensure regulations to allow Licensed Independent Clinical Social Workers (LICSW) to earn up to eight Continuing Education credits per licensure period for providing clinical supervision** to graduate social work students or LCSWs who are pursuing independent licensure.
- The Legislature should **direct and allocate funding to the HPC's Behavioral Health Workforce Center, in partnership with DPH, to develop educational resources outlining the steps in the licensure process** and the specific requirements associated with each license type identified in this report.

Please see the attached document for the BHWC's full report and recommendations, which is also available on the HPC's website. Please do not hesitate to reach out to HPC Deputy Chief of Staff, Ashley Caunter, at Ashley.Caunter@mass.gov with any questions.

Thank you,



David Seltz
Executive Director

CC:
Senator Michael J. Rodrigues, Senate Chair, Joint Committee on Ways and Means
Representative Aaron Michlewitz, House Chair, Joint Committee on Ways and Means
Senator John Velis, Senate Chair, Joint Committee on Mental Health, Substance Use and Recovery
Representative Mindy Domb, House Chair, Joint Committee on Mental Health, Substance Use and Recover