TO: Pacific Source - Jill Hymas, Montana Provider Relations Manager
FROM: National Association of Social Workers (NASW), Montana Chapter
DATE: July 29, 2026
RE: Request for Reconsideration of Board Registered Associate Policy Change

NASW Montana is deeply concerned about PacificSource's recently announced policy change that will prohibit Board Registered Associates (BRAs) from providing covered services to their patients effective October 1, 2026.

Montana law recognizes that clinicians in training may provide behavioral health services under appropriate supervision through a candidate license. These highly educated professionals play an important role in expanding access to behavioral health care across our state.

The announced policy change appears inconsistent with Montana's broader efforts to reduce barriers to practice and expand the behavioral health workforce. Governor Greg Gianforte's recent licensing reform initiatives, including Executive Order No. 1-2026, emphasize strengthening workforce capacity and reducing unnecessary barriers to licensure and practice. Policies that limit supervised pre-licensure clinicians' ability to provide covered services work against these broader workforce priorities.

This issue is particularly concerning given Montana's ongoing shortage of fully licensed behavioral health providers. Removing supervised pre-licensure clinicians from the pool of covered providers will further restrict access to care, lengthen waitlists, and potentially force patients to interrupt established treatment or go without care altogether.

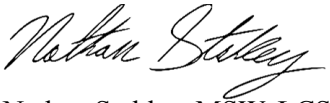
The timing of this proposed change is also deeply concerning. PacificSource has announced that it will no longer offer health insurance coverage in Montana effective January 1, 2027. Yet providers have recently been informed that supervised pre-licensure clinicians may no longer provide covered services during the final quarter of the current plan year. Members selected their plans with the expectation that their benefits would remain available through the coverage period. Many may have already met their deductibles and out-of-pocket maximums and could now face losing access to an established treating clinician.

NASW Montana respectfully urges PacificSource to reconsider this policy change and engage with stakeholders to identify a solution that maintains appropriate standards for supervision and patient safety while preserving access to care.

At a minimum, if the policy change is ultimately implemented, NASW Montana strongly encourages PacificSource to delay its effective date until the next plan year. This would provide members with an opportunity to make informed enrollment decisions, give providers and practices adequate time to plan for and transition care, and better protect continuity of treatment.

We appreciate your consideration of this request and would welcome the opportunity to discuss this issue further with PacificSource representatives.

Sincerely,



Nathan Stahley, MSW, LCSW
Executive Director, Montana Chapter
National Association of Social Workers
nstahley.naswmt@socialworkers.org
(406) 449-6208