



DEPARTMENT OF HEALTH

Wes Moore, Governor · Aruna Miller, Lt. Governor · Meena Seshamani, M.D., Ph.D., Secretary

February 24, 2026

The Honorable Heather Bagnall
Chair, House Health Committee
240 & 241 Taylor House Office Building
Annapolis, MD 21401

RE: HB 922 – Behavioral Health Administration – Behavioral Health Program Relocation – Regulations– Letter of Opposition

Dear Chair Bagnall and Committee Members:

The Maryland Department of Health (the Department) respectfully submits this letter of opposition for House Bill (HB) 922 – Behavioral Health Administration – Behavioral Health Program Relocation – Regulations. Effective October 1, 2026, HB 922 would require the Behavioral Health Administration (BHA) to promulgate regulations authorizing behavioral health programs to relocate to another site via expedited approval process for relocation, separate from the process to license new behavioral health programs. The expedited approval process would permit the use of previously submitted documentation if the information is unchanged or irrelevant to the relocation. The bill would further require temporary approval for a relocating behavioral health program if BHA determines that the new location meets life and safety standards. Finally, BHA would be required to consider the behavioral health program’s regulatory record as a basis for streamlining the relocation review and approval process and issue clear timelines and standards for the relocation review.

This legislation is expected to have an annual fiscal impact of over \$4 million from FY2027 through FY2031. BHA oversees the licensing of over 1,130 community-based behavioral health organizations across 5,508 sites. Creating a separate, expedited approval process will require the Administration to hire 8 additional staff to ensure that programs moving to new sites meet the requirements in the Code of Maryland Regulations (COMAR) 10.63 et. seq. and 10.21 et. seq.

BHA is currently engaged in a process to [substantially revise](#) COMAR 10.63, expanding the current nine chapters to 39 chapters, including program-specific site requirements. As a part of this process, BHA plans to include regulatory provisions which would allow for a streamlined application process for providers with an existing license who are relocating or adding an additional program site. The Department expects to publish the regulations in the Maryland Register following the legislative session and believe these forthcoming regulatory changes will accomplish the intent of this legislation.

Apart from regulatory changes, the Department notes that an expedited process that considers the regulatory history of providers may be challenging. The Department would need to adopt additional regulations and likely subregulatory guidance to clearly communicate with programs what criteria and the period of lookback it will use as grounds for approving or denying an expedited approval. Although HB 922 does not contemplate an appeals process, the Department anticipates that providers would request access to a hearings process should such an expedited approval be denied.

Despite these challenges, the Department appreciates the bill's intention to make the relocation less burdensome for behavioral health programs. Additionally, as described, the Department believes the planned regulatory revisions to COMAR 10.63 will accomplish the intent of this legislation without a significant fiscal impact.

If you would like to discuss this further, please do not hesitate to contact Meghan Lynch, Director of Governmental Affairs at Meghan.Lynch@maryland.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Meena Seshamani', with a stylized flourish at the end.

Meena Seshamani, M.D., Ph.D
Secretary of Health