

THE COALITION TO PROTECT MARYLAND'S CHILDREN

Our Mission: To combine and amplify the power of organizations and citizens working together to keep children safe from abuse and neglect. We strive to secure budgetary and public policy resources to make meaningful and measurable improvements in safety, permanence, and wellbeing.



HB0396 - Residential Child Care Programs - Education of Children and Training of Child and Youth Care Practitioners
House Ways & Means Committee
February 11, 2026

Position: Informational Only

The Coalition to Protect Maryland's Children is a consortium of organizations and individuals formed in 1992 who are concerned about the care of Maryland's most vulnerable children and work together to educate and promote meaningful child welfare reform. CPMC is providing this information-only document for the committee's consideration of HB0396 - *Residential Child Care Programs - Education of Children and Training of Child and Youth Care Practitioner*.

Although we agree with the educational and developmental supports outlined and appreciate the bill sponsor's concern about the educational outcomes of youth in out-of-home care, there are some concerns:

- Several responsibilities fall outside a Residential Child Care (RCC)'s legal authority. Some language in the bill seems to place full responsibility on RCC programs in ways that do not align with statutory partnership.
- Some of the educational programs sited are already required under COMAR 14.31.06, and audited regularly, as these requirements are already built into licensure requirements. Adding them under the residential child and youth care practitioner (RCYCP) seems duplicative.
- There are concerns about operational implementation of the added trainings. The State Board's formal "Board-Approved Training Provider" process under COMAR 10-57.03 and 10.57.04 currently requires providers to submit curriculum, document trainer qualifications, evaluation standards, submit application fee before training can be counted toward RCYCP certification. However, since the Board is understaffed, this has caused significant delays with securing testing dates, candidates nearing or exceeding the 180-day window. Adding new requirements would add additional burden to the Board's already strained workforce/load, potentially worsening the current backlog at a time when workforce stability is already a significant challenge.
- We do agree with additional autism specific trainings, as the evolution of RCC youth population continues to change, specifically with our Emotional and Cognitive Developmentally Disabled (ECDD) programs. Required training in autism and complex behavioral needs could be tremendously valuable to continue to prepare programs to evolve to meet the needs of youth that become involved in the system/overstay. Existing providers are committed to using our infrastructure and

expertise to support Maryland's evolving needs; however, ECDD Program (Class 6) rate does not reflect true cost to serve these youth:

- Based on our experience, the staffing demands are dramatically higher- 40% more supervisory hours per youth and four times more direct care staffing than Class 2.
- Activation barriers include funding model constraints, COMAR requirements and workforce limitations.

Again, we appreciate the bill sponsor's intent and hope that we may serve as a source of information in the development of future legislation on these topics.

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