

Department of Legislative Services
Maryland General Assembly
2026 Session

FISCAL AND POLICY NOTE
First Reader

Senate Bill 898
Finance

(Senator McCray)

**Maryland Medical Assistance Program – Registered Behavior Technicians –
Reimbursement**

This bill requires the Maryland Department of Health (MDH) to provide reimbursement for applied behavior analysis (ABA) services provided by a “registered behavior technician” (RBT) to Medicaid recipients with autism spectrum disorder (ASD). MDH may not require as a condition of reimbursement that an individual receive a certification from the Behavior Analyst Certification Board (BACB) or another credentialing entity to provide ABA services as an RBT. However, MDH may require that an RBT obtain and maintain a current certification within 150 days after the individual begins providing ABA services to Medicaid recipients. MDH must adopt regulations necessary to carry out the bill. The bill must be construed to apply prospectively only.

Fiscal Summary

State Effect: MDH can likely conduct administrative oversight of RBTs to verify certification as permitted under the bill using existing budgeted resources. Revenues are not materially affected.

Local Effect: None.

Small Business Effect: Potential meaningful.

Analysis

Bill Summary: “Registered behavior technician” means a paraprofessional who delivers ABA services that are provided to individuals with ASD under the supervision of a licensed psychologist, a board certified behavior analyst-doctoral (BCBA-D), or a board certified

behavior analyst (BCBA). “Board certified behavior analyst” means a licensed professional who renders and provides direction for ABA services that are provided to individuals with ASD and has obtained a BCBA certification. “Board certified behavior analyst-doctoral” means a licensed professional who renders and provides direction for ABA treatments that are provided to individuals with ASD and has obtained a BCBA certification with a doctoral-level credential.

Current Law: Maryland regulations ([COMAR 10.09.28.01](#)) define “applied behavior analysis” as the design, implementation, and evaluation of environmental modifications using behavioral stimuli and consequences to produce socially significant improvements in human behavior. ABA includes the direct observations, measurement, and functional analysis of the relations between environment and behavior.

“Registered behavior technician” means a paraprofessional certified by BACB who delivers ABA services that are provided to participants with ASD under the supervision of a licensed psychologist or a licensed behavior analyst.

Under State Board of Professional Counselors and Therapists regulations ([COMAR 10.58.16.02](#)), “registered behavior technician” means an individual who (1) is credentialed as an RBT by BACB or a successor organization and (2) practices behavior analysis under the close, ongoing supervision of a licensed behavior analyst in accordance with requirements set by BACB.

State Fiscal Effect: MDH currently provides reimbursement for ABA services delivered to Medicaid participants by RBTs certified by BACB. MDH regulations similarly define RBTs as personnel supervised by a licensed psychologist, a BCBA-D, or a BCBA. MDH currently permits a *90-day* grace period for new RBT providers to achieve certification.

The bill permits MDH to require that an RBT obtain and maintain a current certification *within 150 days* after providing ABA services to Medicaid recipients. This will require ongoing administrative oversight of RBTs to confirm they have obtained the required certification. Any increase in Medicaid expenditures (50% general funds, 50% federal funds) associated with this oversight is assumed to be minimal and is likely absorbable within existing budgeted resources.

As of February 2026, Maryland had 1,223 certified behavior technicians (BTs). Currently, the sole prerequisites for a BT to qualify for the 90-day grace period are a high school diploma or a General Educational Development certificate. MDH analysis indicates that only 28% of BTs attain RBT certification by the conclusion of the 90-day grace period. Consequently, a substantial number of providers are receiving reimbursement for therapy services in which they lack full training. Increasing the grace period to 150 days is likely to exacerbate this challenge. MDH advises that its preference is to exclusively enroll fully

certified RBTs to ensure an appropriate standard of care and streamline the oversight and administrative processes.

Small Business Effect: RBTs who work for small business health care providers may provide ABA services for up to 150 days before obtaining certification.

Additional Information

Recent Prior Introductions: Similar legislation has not been introduced within the last three years.

Designated Cross File: None.

Information Source(s): Maryland Department of Health; Department of Legislative Services

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caw/ljm

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