



**2020 SESSION
POSITION PAPER**

- BILL:** SB 521 – Behavioral Health – Opioid Treatment Services Programs – Medical Director
- COMMITTEE:** Senate Finance Committee
- POSITION:** Letter of Concern
- BILL ANALYSIS:** SB 521 would require each opioid treatment services program to be under the direction of at least one on-site medical director, require that this medical director be on site at least twenty (20) hours per week and prohibit any of the on-site requirements to be delivered via telehealth methods.

POSITION RATIONALE: The Maryland Association of County Health Officers (MACHO) submits a **letter of concern for SB 521** as the bill’s requirements will jeopardize practices at a time when the need and demand for services is great during the ongoing opioid epidemic. This bill will reduce access to critical treatment in some of our neediest and poorer communities.

Current regulations require that the medical director be a physician with addiction specialization, a specialization that few physicians have. The cost of employing these specialized physicians at the 20 hours/week that SB 521 requires, will greatly increase the cost of the service and be prohibitive for some counties to justify and sustain.

The weekly hours requirement may place some opioid treatment services programs that are currently in operation, in danger of having to close as they may not be able to recruit a medical director who is able to work at the site for the requisite 20 hours/week.

In rural areas where there are fewer patients in medication-assisted treatment, there is less of a need for a physician to be on site this many hours a week as these patients do not need to be evaluated on a weekly basis. Some follow up with patients does lend itself to being conducted via telehealth, and SB 521 would not allow this to be offered as part of the 20 hours/week coverage requirement. Telehealth enables services to be provided in a less expensive way in practices that cannot support this level of physician coverage completely in person.

For these reasons, the Maryland Association of County Health Officers submits this **letter of concern for SB 521**. For more information, please contact Ruth Maiorana, MACHO Executive Director at rmaioral@jhu.edu or 410-614-6891. *This communication reflects the position of MACHO.*