



February 18, 2020

**Senate Finance Committee
TESTIMONY IN OPPOSITION**

SB 521 Behavioral Health - Opioid Treatment Services Programs - Medical Director

Behavioral Health System Baltimore (BHSB) is a nonprofit organization that serves as the local behavioral health authority (LBHA) for Baltimore City. BHSB works to increase access to a full range of quality behavioral health (mental health and substance use disorder) services and advocates for innovative approaches to prevention, early intervention, treatment and recovery for individuals, families, and communities. Baltimore City represents nearly 35 percent of the public behavioral health system in Maryland, serving nearly 75,000 people with behavioral health service needs.

BHSB opposes SB 521 Behavioral Health - Opioid Treatment Services Programs - Medical Director.

BHSB understands the intent of SB 521 is to offer a solution for improved oversight and accountability for opioid treatment programs (OTPs). However, requiring a medical director of an OTP be on-site for at least 20 hours a week will not achieve that goal, as the medical director is not responsible for the overall quality of services at the program, operations, and financial accountability of an OTP.

Oversight and accountability of OTPs, and all behavioral health programs in the public behavioral health system (PBHS), is a responsibility that rests with the Maryland Department of Health, Behavioral Health Administration (BHA), in collaboration with local behavioral health authorities. As the local behavioral health authority for Baltimore City, BHSB conducts site visits, completes audits, and investigates complaints and critical incidents for providers in Baltimore City's PBHS. BHSB shares information gathered from these activities with BHA and appropriate response or action is taken collaboratively.

BHSB works diligently support access to quality behavioral health services in Baltimore City's PBHS and is supportive of efforts to strengthen oversight and accountability. BHSB is an active participant at MDH's System of Care Workgroup, which is focused on improving the quality of Maryland's PBHS, with a specific focus on quality services and system accountability. Because of this ongoing effort, BHSB believes that this is the appropriate place to address solutions to improve oversight and accountability. **As such, BHSB urges the Senate Finance Committee to oppose SB 521.**