



Testimony on HB 1461
Behavioral Health Programs – Outpatient Mental Health Centers –
Medical and Clinical Directors
House Health and Government Operations Committee
March 11, 2020
POSITION: OPPOSE

The Community Behavioral Health Association of Maryland is the professional organization for providers of community-based mental health and substance use disorder treatment services. Our members serve the majority of the almost-300,000 children and adults who access care through the public behavioral health system. We provide outpatient treatment, residential and day programs, case management and assertive community treatment (ACT), employment supports, and crisis intervention.

We oppose this bill because it rescinds the provisions in legislation passed unanimously by this committee and the General Assembly last session allowing psychiatric nurse practitioners to serve as medical directors of outpatient mental health centers (OMHCs). This action was taken in response to the extreme challenges OMHCs face in trying to hire psychiatrists as medical directors, which had been a statutory requirement prior to passage of HB 1122/SB 944 in the 2019 session.

A 2019 Joint Chairmen’s Report (Report on Statewide Review of Behavioral Health Workforce Capacity) noted the shortage of psychiatrists in our state. That has been borne out by the experience of our members who have struggled to find psychiatrists to work in OMHCs – even at the direct client care level. Some organizations have recruited for a psychiatrist medical director for over a year without success. And the challenge – while exacerbated in rural areas - is not limited to rural areas.

The medical director position is largely an administrative one that addresses quality assurance activities, preparedness for accreditation, and peer review activities, all responsibilities that can be handled by a psychiatric nurse practitioner. In fact, the Board of Nursing submitted testimony last year stating that, “Nurse practitioners can and do manage independent practices, programs, and clinics. They are well suited for this role.” (Testimony on SB 944 – Behavioral Health Programs – Medical Directors – Psychiatric Nurse Practitioners, dated March 19, 2019.)

Psychiatric nurse practitioners are invaluable to the operations of OMHCs. They handle extremely complex clients and are particularly adept at fostering the teamwork essential for achieving good clinical outcomes. Their medical acumen along with their ability to relate to clients, family members, other clinicians and staff, and parties external to the clinic, make them an excellent choice to serve as medical directors.

Maryland now faces the public health crisis of COVID-19 on top of the opioid epidemic and rising suicide rates. It would be ill-advised to pass legislation that would jeopardize access to treatment for thousands of people with behavioral health needs.

We urge an unfavorable report.