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February 22, 2022

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RE: Senate Bill 350 – Maryland Medical Assistance Program – Community Violence Prevention Services

Position: Letter of concern

Dear Members of the Committee:

The Maryland Psychological Association, (MPA), which represents over 1,000 doctoral level psychologists throughout the state, is writing to express our **concerns**, for **Senate Bill 350 – Maryland Medical Assistance Program – Community Violence Prevention Services** – which would provide community violence prevention services. We applaud the intent but have serious concerns about the implementation of the bill as written.

Section 15–141.3 B 2 requires a clinician to make a risk assessment for potentially being a victim by an unknown person. Making risk-assessment determinations for potential perpetrators of violence is difficult and limited by unpredictable dynamic (i.e. ever-changing factors) and the time-limited nature of predictions. Most determinations are limited to short term predictions for committing future violent acts. Therefore, it is very unclear how a clinician is to determine if a person is at elevated risk (compared to who/what) of being injured by an unknown person(s) and within what time frame (1 day, 1 week, 1 month). There are serious concerns about this reliance on clinical judgement about an unknown person's behavior upon a potential client/patient.

In addition, the section also says these assessments will be completed by licensed healthcare professionals and does not specify what types of licensed healthcare providers. For example, can these assessments be administered by providers outside of mental health? And, are there any specific training requirements or criteria for the licensed healthcare providers to ensure they have the specialized training/knowledge to provide these assessments?

Lastly, it is a concern that a reliance on these type of assessments without more clarity might make qualification for these very important services to be extremely limited. This would mean that these services may be underutilized.

For these reasons, MPA urges the committee to consider our concerns before providing a favorable report on **Senate Bill 350 – Maryland Medical Assistance Program – Community Violence Prevention Services**. If we can provide any additional information or be of any assistance, please do not hesitate to contact the MPA Executive Director, Stefanie Reeves, MA, CAE at 410-992-4258 or exec@marylandpsychology.org.

Respectfully submitted,

Sincerely,

Linda McGhee

Linda McGhee, Psy.D., J.D.
President

R. Patrick Savage, Jr.

R. Patrick Savage, Jr., Ph.D.
Chair, MPA Legislative Committee

cc: Richard Bloch, Esq., Counsel for Maryland Psychological Association
Barbara Brocato & Dan Shattuck, MPA Government Affairs