



Maryland Community Health System

Committee: House Health and Government Operations Committee

Bill Number: HB 421 – Out-of-State Health Care Practitioners – Provision of Behavioral Health Services via Telehealth

Hearing Date: February 10, 2022

Position: Oppose

Maryland Community Health System (MCHS) regretfully opposes *House Bill 421 – Out-of-State Health Care Practitioners – Provision of Behavioral Health Services via Telehealth*. As a network of federally qualified health centers, we appreciate the intent of the legislation to improve access to behavioral health through telehealth. However, we believe this regulatory model may have unintended consequences because of its one-sided approach. The bill allows for out-of-state practitioners to practice telehealth in Maryland, but it does not address the issue of Maryland providers being able to provide telehealth services over state lines.

Federally qualified health centers are focused in the principle of creating patient-centered homes for the communities we serve. Many of our health centers serve patients who live or work in other jurisdictions, including the District of Columbia, Virginia, Delaware, and Pennsylvania. Just as with other Maryland-based providers, we need increased flexibility in providing telehealth services to our patients who are not always physically within Maryland.

This legislation does not promote the patient-centered home model in Maryland. In fact, the legislation will bifurcate the health care system into two sides: out-of-state telehealth providers and Maryland-based providers. On one side, there will be out-of-state telehealth providers who can offer some services, but cannot provide a health home because the bill prohibits them from providing in-person services in Maryland. On the other side, Maryland providers can provide a hybrid model of in-person and telehealth services, but they cannot follow their patients across state lines to provide continuity of services.

We encourage the Maryland General Assembly to consider other licensure reciprocity models, including interstate licensure compacts, that allow integration of Maryland-based providers and out-of-state telehealth providers. We ask for an unfavorable report. If we can provide any further information, please contact Robyn Elliott at (443) 926-3443 or relliott@policypartners.net.