



**Testimony on SB 3**  
**Facilities – Disabilities, Juveniles, Behavioral Health, and Health Care –**  
**Children and Community Relations Plans**  
House Health & Government Operations Committee  
March 30, 2022  
**POSITION: OPPOSE AS AMENDED**

The Community Behavioral Health Association of Maryland (CBH) is the leading voice for community-based providers serving the mental health and addiction needs of vulnerable Marylanders. Our 95 members serve the majority of those accessing care through the public behavioral health system. CBH members provide outpatient and residential treatment for mental health and addiction-related disorders, day programs, case management, Assertive Community Treatment (ACT), employment supports, and crisis intervention.

**We oppose specific amendments made to the bill by the Senate - reflected on p. 3 of the third reader reprint, lines 25 through 30 – that require behavioral health programs to certify their compliance with two National Fire Safety Protection Association codes.** Behavioral health programs are already held to strict fire safety standards – including numerous onsite inspections - by both COMAR and the national accrediting bodies they are subject to as a requisite of licensure. Adding these additional requirements will unnecessarily strain providers’ financial viability as they continue to dig out from the aftermath of COVID and Optum.

It is important to note that these additional requirements are targeted only to behavioral health programs, raising the question of parity and equitable treatment for these providers. In addition, these amendments were never presented orally or in writing during the bill hearing; nor were they shared at the voting session on the bill. We have had no opportunity to discuss the impact of these amendments nor the rationale behind them.

For these reasons we respectfully ask that the committee strike the amendments referenced above, should you decide to vote favorably on SB 3.

Thank you.

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