



## DEPARTMENT OF HEALTH

Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Secretary

March 1, 2023

The Honorable Brian J. Feldman  
Chair, Senate Education, Energy, and the Environment Committee  
2 West, Miller Senate Office Building  
Annapolis, Maryland 21401

### **RE: SB 388 – Public Schools - Standardized Behavioral Health Questionnaire for Students - Development and Implementation - Letter of Support with Amendments**

Dear Chair Feldman and Committee Members:

The Maryland Department of Health (MDH) respectfully submits this letter of support with amendments for SB 388 – Public Schools - Standardized Behavioral Health Questionnaire for Students - Development and Implementation. SB 388 requires the Maryland Consortium on Coordinated Community Supports (Consortium), in consultation with identified stakeholders, to develop guidelines for developing a standardized questionnaire that will be administered to the parents or guardians of students to identify those with behavioral health services needs. SB 388 requires each behavioral health (BH) services coordinator to develop and implement a standardized behavioral health questionnaire that will be given to parents or guardians.

MDH supports the early identification of youth who may have behavioral health needs. Further, and as a result of a helpful conversation with the bill's sponsor, MDH supports the inclusion of questions that ask about physical symptoms which may represent behavioral health needs. Up to half of all individuals who will present with behavioral health needs do so by age 14.<sup>1</sup> Additionally, it is not uncommon for stress and distress to be exhibited by physical symptoms in some people.<sup>2</sup>

In the context of the above supportive statements, MDH respectfully requests the consideration of the following:

1. We recommend each behavioral health coordinator be trained in ensuring that not only the development and implementation of the questionnaire, but also any interpretation of the questionnaire, be absent of avoidable implicit bias.<sup>3,4</sup>
2. Given the nature of the questionnaire MDH encourages continued thoughtful consideration of how this questionnaire will be transferred from the parent/guardian securely to the school.

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<sup>1</sup> Kessler, RC, Berglund, P, Demler, O, Jin, R, Merikangas, KR, Walters, EE (2005). Lifetime prevalence and age-of-onset distributions of DSM-IV disorders in the National Comorbidity Survey Replication. *Archives of General Psychiatry* 62, 593–602. DOI: [10.1001/archpsyc.62.6.593](https://doi.org/10.1001/archpsyc.62.6.593).

<sup>2</sup> United Nations International Children's Emergency Fund (United Nations Children Fund). How to recognize signs of distress in children. N.d. <https://www.unicef.org/parenting/child-care/how-to-recognize-signs-of-distress>.

<sup>3</sup> Marcelin, J. R., Siraj, D. S., Victor, R., Kotadia, S., Maldonado, Y. A. The Impact of Unconscious Bias in Healthcare: How to Recognize and Mitigate It, *The Journal of Infectious Diseases*, Volume 220, Issue Supplement\_2, 15 September 2019, Pages S62–S73, <https://doi.org/10.1093/infdis/jiz214>.

<sup>4</sup> Agrawal, S. Enekeuchi, A. It's Time to Address the Role of Implicit bias Within Health Care Delivery. *Health Affairs*. January 15, 2020. <https://www.healthaffairs.org/doi/10.1377/forefront.20200108.34515/>

3. While appreciating the differences in Maryland's 24 jurisdictions, MDH supports ensuring that jurisdictional standardized questionnaires following the Consortium's guidelines, do not, fundamentally, differ from each other resulting in avoidable disparate identification, misidentification or missed identification of behavioral health needs due to a youth's zipcode (as well as the inherent issues based on assumptions of a youth associated with a race, ethnicity, gender identification, etc.).
4. MDH encourages the ongoing discussion and solutioning of ensuring behavioral health provider capacity to identify and respond equitably to the results of this questionnaire.

MDH is committed to supporting early identification of youth's behavioral health needs. This initiative may increase the chance that earlier access to appropriate treatment occurs which, in turn, may lead to better health outcomes for Marylanders. If you would like further information please contact Megan Peters, Acting Director, Office of Governmental Affairs, at 410-260-3190 or [megan.peters@maryland.gov](mailto:megan.peters@maryland.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "LH Scott".

Laura Herrera Scott, M.D., M.P.H.  
Secretary