



## **Testimony on SB 403**

### **Hospitals and Related Institutions - Residential Treatment Centers - Accreditation**

Senate Finance Committee

February 15, 2024

**POSITION: SUPPORT**

I am L A Spagnola, MSW, President and CEO of Board of Child Care of the United Methodist Church, Inc. Board of Child Care (BCC) is based in Baltimore and has sites across the state of Maryland which offers residential treatment, education and community-based services to thousands of children and families annually with serious mental illness in our community.

SB 403 will allow more choice in the accrediting bodies allowed for residential treatment centers (RTCs), thereby attracting more providers, just like BCC, to open or expand units. For the last several years, Maryland has been struggling with ways to reduce its hospital emergency department (ED) wait times, which remain among the longest in the nation. One of the factors contributing to the wait time problem is children with serious emotional disorders getting stuck in EDs due to lack of an available placement, such as a residential treatment center (RTC).

Board of Child Care fully supports greater choice in accrediting bodies for Medicaid payments in the Residential Treatment Center (RTC) level of care in Maryland. Board of Child Care has been preparing to open a Residential Treatment Center for the past 3 years. BCC was approved for a Hospital Overstay grant, designed to address children with serious emotional issues who are stuck in an ED. After being awarded the grant, BCC became aware of the statutory requirement to be Joint Commission accredited to receive Medicaid payments to deliver Residential Treatment Centers (RTCs). Board of Child Care is accredited by CARF, another federally recognized accreditation body, approved in Maryland for many other behavior health services, but not RTC services. The requirement to be Joint Commission Accredited is one of the factors slowing down our ability to serve vulnerable youth through an RTC.

Board of Child Care carefully researched accreditation bodies and chose one of the federally designated options, CARF, because of its goodness of fit with our programming and philosophy. CARF was founded to accredit health and human service organizations such as aging services, behavioral health, children and youth services, and other agencies like Board of Child Care. Whereas Joint Commission accredits health care organizations like hospitals, doctor's offices, nursing homes and behavioral health treatment facilities. CARF provides the right fit for our diverse programming and continuum of care.

Currently, Maryland statute only recognizes the Joint Commission on Accreditation of Healthcare Organizations (Joint Commission) for RTCs. Nationally, two more accrediting bodies – the Commission on Accreditation of Rehabilitation Facilities (CARF) and the Commission on Accreditation (COA) have been recognized by the federal government for several years as appropriate to monitor RTCs (42 CFR 441.151). in fact, Maryland recognizes CARF and COA for the various other community behavioral health service lines my organization provides,

Representatives from CARF have identified Maryland as the only state not to recognize CARF as an accrediting body for RTCs. The great majority of children served in RTCs end up being discharged back to the community – either to their family, a community provider like ours, or a foster care placement. It is time that Maryland allowed accrediting bodies that focus on rehabilitation to monitor RTCs allowing providers the choice to become accredited by the body that most closely aligns with our service line and treatment philosophy.

We urge a favorable report on SB 403.

Sincerely,

A handwritten signature in blue ink that reads "L A Spagnola". The signature is written in a cursive, flowing style.

L A Spagnola, MSW  
President and CEO  
Board of Child Care