

THE COALITION TO PROTECT MARYLAND'S CHILDREN

Our Mission: To combine and amplify the power of organizations and citizens working together to keep children safe from abuse and neglect. We strive to secure the budgetary and public policy resources to make meaningful and measurable improvements in safety, permanence, and well-being.

Testimony on SB0403

Hospitals and Related Institutions - Residential Treatment Centers - Accreditation

Senate Finance Committee

February 15, 2024

POSITION: SUPPORT

The Coalition to Protect Maryland's Children (CPMC) is a consortium of Maryland organizations and individuals formed in 1996 to promote meaningful child welfare reform.¹

CPMC strongly supports SB0403 – Hospitals and Related Institutions – Residential Treatment Centers – Accreditation. Maryland has been grappling with ways to reduce its hospital emergency department (ED) wait times, which are 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). SB0403 will help with that problem by allowing more choice in the accrediting bodies allowed for residential treatment centers (RTCs), thereby attracting more providers to open or expand units.

Current Maryland statute only recognizes the Joint Commission on Accreditation of Healthcare Organizations (JCAHO). This policy dates back to a time when hospitals were the only providers of RTCs. Since that time, two more accrediting bodies – the Commission on Accreditation of Rehabilitation Facilities (CARF) and the Commission on Accreditation (COA) have long been recognized by the federal government as appropriate to monitor RTCs (42 CFR 441.151). Maryland itself recognizes CARF and COA for the various other community behavioral health service lines as well as for Intermediate Care Facilities (ICF). Because CARF and COA focus on a rehabilitative model rather than a medical model, most behavioral health providers choose one of those organizations for their accreditation. They would then need to get a second accreditation solely for their RTC program, which would be costly in terms of both time and money.

In Maryland, there are currently 28 agencies accredited through COA and a total of 2440 programs accredited by CARF. Increasing the number of accreditation options available to them will expand opportunities for these providers to become accredited as an RTC and increase the available placement options for some of the State's most vulnerable youth.

Representatives from CARF have advised us that Maryland is 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, or a foster care placement. It is time that Maryland allowed accrediting bodies that focus on rehabilitation to monitor RTCs.

For these reasons, we urge a favorable committee report and passage of Senate Bill 403.

¹ This position is supported by the following member organizations: Board of Child Care, Child Justice, Inc., Citizens' Review Board for Children, FCN Foundation, The Franklin Law Group, P.C., Maryland Chapter of the American Academy of Pediatrics, Maryland Association of Resources for Families and Youth, MOMCares, National Association of Social Workers – Maryland Chapter, Tim Briceland – Betts (individual), Diana Philip (individual)