

March 13, 2024

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The Hon. Joseline A. Peña-Melnyk, Chair  
Health and Government Operations Committee  
Maryland General Assembly  
241 Taylor House Office Building  
6 Bladen Street  
Annapolis, MD 21401

The Hon. Bonnie Cullison, Vice Chair  
Health and Government Operations Committee  
Maryland General Assembly  
241 Taylor House Office Building  
6 Bladen Street  
Annapolis, MD 21401

**RE: Pyramid Healthcare Testimony in Opposition to House Bill 1396, An Act Concerning Drug and Alcohol Treatment Programs – Discharge of Patients and Referral Services – Standards**

Dear Chair Peña-Melnyk, Vice Chair Cullison, and distinguished members of the Committee:

The Pyramid Healthcare, Inc. (“Pyramid Healthcare”) family of companies is providing testimony below in opposition to House Bill 1396, which would require, among other provisions, that any residential substance use disorder (“SUD”) treatment facility licensed by the Maryland Department of Health (“MDH”) must prepare a discharge plan upon a patient’s discharge or withdrawal from the facility. While we provide discharge-planning services for our clients and believe this is crucial to ensuring long-term recovery, we oppose the bill as written and urge you to incorporate our feedback when considering the legislation.

Pyramid Healthcare is an integrated behavioral healthcare system serving Medicaid and commercial clients in 9 states across a continuum of residential and outpatient substance abuse, mental health, autism, and eating disorder treatment services. We employ over 3,600 team members across our 80+ active facilities which treat approximately 12,000 clients on any given day.

In Maryland, we operate four locations: a detox & residential and an outpatient treatment center in California, a detox and residential treatment center in Charlotte Hall, and a detox & residential treatment center in Joppa. In total, we have approximately 170 substance use disorder residential treatment beds for adult Medicaid clients across the state. We are currently under construction on our new Prince George’s facility and expected to begin operations in mid-2024 with approximately 75 detox and residential substance use treatment beds for adults with substance use disorder. That facility will be located in outside of Bowie and will serve the residents of Prince George’s County, Anne Arundel County, and throughout central Maryland.

To be clear, discharge planning is essential to ensuring our patients are able to sustain long-term recovery. Currently, Pyramid Healthcare provides discharge planning services for our clients; however, the language of the legislation duplicates existing safeguards, puts additional administrative burden on providers, and invites punishment to high-quality providers serving vulnerable patient populations.

Pyramid Healthcare maintains third party accreditation from the Commission on Accreditation of Rehabilitation Facilities (“CARF”) for all of our facilities, including our treatment programs in Harford County, Charlotte Hall, and California. We are licensed by the MDH and maintain contracts with various payers, including both Medicaid fee-for-service and managed care organizations (“MCOs”). We also adhere to and advocate for alignment of practices in accordance with the American Society of Addiction Medicine (“ASAM”). As part of these existing agreements, we regularly undergo various audits throughout the year by regulators, accreditors, and payers of our processes, procedures, and documentation for our clients, including related to discharge planning.

As such, creating additional layers of administrative requirements related to discharge planning are unnecessary duplications of existing procedures. Furthermore, this would create additional paperwork burdens for our staff and clinicians who are trying to treat existing clients and admit new clients. It would also create the risk of non-compliance for providers resulting from conflicting requirements that may lead to a corrective action plan (“CAP”) during a survey or audit from one of the entities listed above.

While certain clients may leave our facility against medical advice or be unwilling or unable to sign documentation related to discharge planning, we have robust internal policies and protocols to address these situations and ensure adequate discharge planning has taken place.

Please consider this feedback and do not pass this bill out of Committee. Thank you for your support of mental health, behavioral health, and substance use providers in Maryland and for considering my requests on behalf of Pyramid Healthcare. If we can provide any additional information or materials, please contact me at [crosier@pyramidhc.com](mailto:crosier@pyramidhc.com) or 667-270-1582. In addition, we invite you or a member of the Committee or staff to reach out and schedule a visit to one of our Maryland locations sometime soon to learn more about our programs and services.

Sincerely,



Collan B. Rosier  
Vice President of Government Relations

**CC: Members, House Health and Government Operations Committee  
Michelle Firmin, Assistant to Chair**