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## Testimony on HB1515

### Certificate of Need - Intermediate Health Care Facilities – Exemptions

Health and Government Operations Committee

March 13, 2025

#### POSITION: SUPPORT

I am Shannon Hall, Executive Director of the Community Behavioral Health Association of Maryland (CBH). CBH is the leading voice for community-based providers serving the mental health and addiction needs of vulnerable Marylanders. Our 87 members serve the majority of individuals who access 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.

CBH represents about 10% of the licensed residential substance use treatment (SUD) programs subject to certificate of need regulation by the Maryland Health Care Commission (MHCC). On behalf of our members, we are pleased to support HB1515.

We believe that the bill balances oversight by the MHCC on development and expansion of residential SUD treatment capacity with a lower administrative burden than the full certificate of need (CON) process would require. We appreciate the MHCC's proactive approach to regulation in this instance, as well as their recognition of the burden that a full CON process could impose on small providers. We think the bill seeks a balanced approach. MHCC's positive history of engaging with the providers it regulates and addressing their concerns also increases our confidence in this approach.

For these reasons, CBH is pleased to support HB1515 and urges your support as well. We look forward to working with the Maryland Health Care Commission to ensure the future of high-quality behavioral health services in Maryland.

*For more information contact Shannon Hall at [shannon@mdcbh.org](mailto:shannon@mdcbh.org).*