



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

Board of Professional Counselors & Therapists  
4201 Patterson Avenue, 3<sup>rd</sup> Floor  
Baltimore, MD 21215

February 13, 2025

The Honorable Joseline A. Peña-Melnyk  
Chair, House Health and Government Operations Committee  
Room 241, House Office Building  
Annapolis, Maryland 21401

**RE: HB 745 – State Board of Professional Counselors and Therapists – Behavior Analysts –  
Licensure Applications – Letter of Information**

Dear Chair Peña-Melnyk and Committee Members:

The Maryland Board of Professional Counselors and Therapists (the “Board”) is submitting this letter of information for HB 745 State Board of Professional Counselors and Therapists – Behavior Analysts – Licensure Applications.

The Board has concerns regarding the bill allowing for only 10 days to issue a license to a behavior analyst after receiving the application (see pg. 1, lines 21-24). Delays over the past few years may be attributed to an increased volume and rapid growth of the credential. Now there are over 1500 licensed behavior analysts compared to approximately 780 in 2020. Additionally, many applicants fail to submit completed applications which has contributed to delays. This issue alone would make the 10-day window very difficult to achieve. The Board believes that extending this window to 30 days would be a reasonable amount of time to allow a comprehensive review of applications, which is how the Board is presently operating with the support of the Board’s current licensed behavior analysts.

I hope this information is useful. If you would like to discuss this further, please contact Winnie Moore, Board Chair, at (240) 346-9712 or email [Winnie.moore@maryland.gov](mailto:Winnie.moore@maryland.gov) or Lillian Reese, Legislative Liaison at (443) 794-4757 or [lillian.reese@maryland.gov](mailto:lillian.reese@maryland.gov).

Respectfully,

Chair, Board of Professional Counselors & Therapists

*The opinion of the Board expressed in this document does not necessarily reflect that of the Department of Health or the Administration.*