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March 28, 2025

Committee Chairman Will Smith
Miller Senate Office Building, 3 West Wing
11 Bladen St., Annapolis, MD 21401

RE: HB 1480 – Appropriations – Child Advocacy Centers – Continuity of Care Standards for Healthcare Professionals and Reports of Violations

POSITION: UNFAVORABLE

Dear Chair Smith:

Thank you for the opportunity to testify on Senate Bill 1480 - Child Advocacy Centers – Continuity of Care Standards for Healthcare Professionals and Reports of Violations. We respectfully request that this committee return an unfavorable report on the bill for the reasons set forth in this letter.

As a mental health services provider, we are required to uphold the licensure requirements set forth by the State of Maryland. As a partnering agency for child advocacy centers, we accept referrals for services and respond accordingly. We do not share specific employment details of our providers with the child advocacy center. Employment changes are not communicated with CACs, however, we agree via Memorandum of Understanding that we will provide licensed and appropriately supervised professionals to provide services for CAC clients.

If a licensed mental health professional that has been treating a child victim is no longer able to continue treatment due to termination, change in job, or any other reason, the licensure standards established in COMAR governing each professional's licensure outline continuity of care requirements. Licensed mental health professionals have continuity of care requirements governed by their professional licensure standards. For example, Md. Code Regs. 10.36.05.07 outlines the continuity of care required of psychologists or psychology associates in the event of termination of services. Social workers have similar requirements under Md. Code Regs. 10.42.03.03. Both the Board of Examiners of Psychologists and the Board of Social Work Examiners conduct thorough investigations of complaints against professionals licensed under their authority. Each Board's complaint process and investigation is comprehensive.

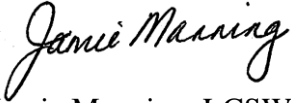
The standards of continuity of care are already well established within the existing licensure regulations. Further legislating these requirements specifically for professionals serving CAC clients creates unnecessary duplication and confusion. It also undermines the role of the regulatory boards that already have the authority and expertise to oversee the conduct of licensed professionals. HB 1480 would place an undue burden on agencies and practitioners who are already required to follow licensure standards, potentially leading to inconsistencies and unintended negative impacts on client care.

To improve the quality of life in our community through crisis intervention and violence prevention
A United Way Agency Serving Wicomico, Worcester, & Somerset Counties

We are committed to ensuring that all children who come through our doors receive high-quality care, but this bill is not the right approach to address these concerns. We respectfully urge the committee to return an unfavorable report.

Thank you for considering our position on this important matter. Please do not hesitate to contact us if you require further information or clarification.

Sincerely,

A handwritten signature in black ink that reads "Jamie Manning". The signature is written in a cursive, flowing style.

Jamie Manning, LCSW-C, CNP
Executive Director