



**2026 SESSION
POSITION PAPER**

BILL: SB 39 – Behavioral Health – Certified Community Behavioral Health Clinics and Outpatient Mental Health Centers – Reimbursement Rates
COMMITTEE: Senate – Finance Committee
POSITION: Letter of Information
BILL ANALYSIS: SB 39 establishes a Workgroup on Certified Behavioral Health Clinic Implementation and Rate Methodology in BHA; requires MDH to conduct a certain rate study of outpatient mental health centers in MD; requires MDH to increase the MD Medical Assistance Program reimbursement rate for outpatient mental health centers by 3% in FY 26 and FY 27; and other related actions.

POSITION RATIONALE: The Maryland Association of County Health Officers (MACHO) supports a rate study for Outpatient Mental Health Centers (OMHCs) and increasing reimbursement rates, activities that would directly address long standing structural challenges that threaten access to essential behavioral health services across MD. We recognize that BHA has been working to achieve these objectives, some of which were authorized by 2017 legislation and others that depend on federal action. Therefore, MACHO provides an LOI for SB 39, to share how some of our local health departments are involved in delivering these services and how they are dependent on BHA completing this crucial work.

OMHCs provide critical services in communities throughout the state, including counseling, medication management for individuals with serious mental illness, treatment for substance use disorders, buprenorphine induction, school-based services for children in crisis, and more. OMHCs offer trusted, community-based care that enables individuals to receive treatment close to home, an especially vital function in rural and underserved areas where transportation and access are persistent barriers.

Despite their essential role, OHMCs are facing a growing crisis. Reimbursement rates have not kept pace with rising salaries, benefits, and operating costs, placing severe financial strain on providers and leading to closures, including the loss of an OHMC in Frederick County last year. At the same time, outdated regulatory and reimbursement frameworks limit operational flexibility and fail to reflect current clinical practice or workforce realities, even as the State has expanded the roles of qualified behavioral health professionals to improve efficiency and reduce costs. MACHO was invited to participate in the review of COMAR 10.63 regulations BHA has underway and will continue to provide input where possible and invited.

Planned reforms will help prevent further erosion of Maryland’s OMHC infrastructure and increase access to care for those who need it most.

For these reasons, the Maryland Association of County Health Officers submits this Letter of Information for SB 39. For more information, please contact Ruth Maiorana, MACHO Executive Director at рмаioral@jhu.edu or 410-937-1433. *This communication reflects the position of MACHO.*