



March 6, 2026

Senate Finance Committee

SB878 - Health Facilities - Certified Recovery Residences - Unannounced Inspections

POSITION: Favorable with amendments

The Recovery Housing & Treatment Center Coalition of Maryland (RHTC) appreciates the opportunity to submit written testimony in support of House Bill 448, which would require the Maryland Department of Health (MDH) to conduct unannounced inspections of certified recovery residences. RHTC strongly agrees that robust oversight and accountability are essential to maintaining the integrity, safety, and credibility of recovery housing across Maryland.

RHTC represents recovery housing and treatment providers across Maryland who deliver stable, safe, and supportive environments for individuals in recovery from substance use disorders. The Recovery Residence Grant Program plays a critical role in sustaining this continuum of care.

High-quality recovery residences play a critical role in Maryland's behavioral health continuum. Thoughtful oversight strengthens public trust, protects residents, and ensures that providers operating in good faith are held to consistent and fair standards.

While RHTC supports the intent of SB 878 and the use of unannounced inspections as a compliance tool, we respectfully request targeted amendments to clarify expectations, ensure fairness, and promote consistent enforcement across the state.

RHTC supports the bill's requirement that MDH conduct at least two unannounced on-site inspections annually for each certified recovery residence. Unannounced inspections can be an effective mechanism to ensure real-time compliance with statutory and regulatory standards, identify deficiencies that may not surface during scheduled reviews, protect residents by reinforcing accountability.

We also appreciate the inclusion of a remediation period prior to revocation, which recognizes that deficiencies can often be corrected promptly and in good faith.



Areas Where Clarifying Amendments Are Needed

Despite our support for the bill's intent, RHTC has concerns that, as currently drafted, SB 878 lacks sufficient guidance in several key areas. Without clarification, the bill could lead to inconsistent enforcement, confusion for providers, and avoidable disputes.

1. Lack of Defined Scope for Unannounced Inspections

SB 878 does not specify what an unannounced inspection entails, including:

- The operational areas subject to review
- Documentation that may be requested
- Standards that will be assessed during the inspection

Clear statutory guidance is needed so providers understand expectations and can consistently maintain compliance. Leaving these issues entirely to future regulation risks uneven application across regions and inspectors.

RHTC recommends that the bill include baseline statutory parameters outlining:

- The general scope of inspection activities
- Categories of compliance being reviewed
- Reference to applicable statutory and regulatory standards

2. Provider Availability and Good-Faith Access

RHTC agrees that providers should not be able to avoid oversight by being unavailable. However, SB 878 does not address how MDH should proceed when:

- A recovery residence is temporarily unstaffed
- Key personnel are off-site due to clinical or emergency obligations
- Access is delayed for legitimate operational reasons

Without clarity, providers acting in good faith could be penalized unfairly.

RHTC recommends language establishing:

- A reasonable protocol for inspector access
- Clear expectations regarding provider availability
- Safeguards to ensure providers cannot intentionally evade inspection, while also recognizing operational realities



3. Consistency, Due Process, and Predictability

RHTC believes that clear statutory standards—rather than solely regulatory discretion—are essential for:

- Consistent enforcement across jurisdictions
- Fair treatment of providers
- Transparency in corrective action expectations
- Providers benefit when expectations are explicit, predictable, and uniformly applied. Clear guidance also supports MDH by reducing ambiguity and potential disputes.

RHTC is committed to working collaboratively with the bill sponsor, committee members, and the Maryland Department of Health to strengthen SB 878. Our coalition includes experienced providers who understand both compliance requirements and operational realities, and we would welcome the opportunity to assist in refining inspection standards that are both rigorous and workable.

RHTC supports House Bill 448 and its goal of strengthening oversight of certified recovery residences. With targeted amendments to clarify inspection scope, provider access expectations, and compliance standards, this legislation can effectively protect residents while ensuring fairness and consistency for providers.

For these reasons, RHTC respectfully urges a favorable report with amendments and looks forward to continued collaboration on this important policy.

For more information call or email:

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