

**Senate Bill 39 Behavioral Health - Certified Community Behavioral Health Clinics and Outpatient  
Mental Health Centers - Reimbursement Rates**

Finance Committee

March 3, 2026

**Position: FAVORABLE WITH AMENDMENTS**

Mental Health Association of Maryland (MHAMD) is a nonprofit education and advocacy organization that brings together consumers, families, clinicians, advocates and concerned citizens for unified action in all aspects of mental health and substance use disorders (collectively referred to as behavioral health). We appreciate the opportunity to provide this testimony in support of Senate Bill 39, with amendments.

Sponsor amendments to SB 39 will align the bill with HB 772.

As amended, SB 39 would establish the Workgroup on Behavioral Health Rate Methodology Modernization in the Maryland Health Care Commission (MHCC) to develop transparent, cost-based reimbursement methodologies for certified community behavioral health clinics (CCBHC) and outpatient mental health centers (OMHC).

The HOPE Act of 2017 ([CH 572/SB 967](#) | [CH 571/HB 1329](#)) included a provision requiring the Behavioral Health Administration (BHA) and Maryland Medicaid to conduct an independent, cost-driven rate-setting study to set reimbursement rates for providers of community-based behavioral health services and to implement a payment system based on the findings of this study. This work was supposed to be completed by September 30, 2019. *See Md. Annotated Code, Health-General Article §16-201.3(e)*

Unfortunately, for a variety of understandable reasons – including departmental budgetary and staffing challenges, the covid pandemic, uncertainty at the federal level and more – this rate study was never completed. Nevertheless, Maryland behavioral health providers have been asked to continue delivering quality mental health and substance use care for years at rates that do not reflect the cost of doing business. This is an unsustainable arrangement that impacts access to care for Marylanders in need of these services.

To their credit, BHA reported earlier this session that they have contracted with a vendor to facilitate the HOPE Act's required rate study over the next 12-18 months; and we very much appreciate the work they have led over the past year to engage stakeholders and prepare Maryland for an eventual application to participate in the federal CCBHC demonstration program. These are critically important initiatives, and MHAMD supports any efforts that would complement, support and accelerate that work.

Thank you for your attention to these comments. Please do not hesitate to contact us with any questions.

*For more information, please contact Dan Martin at (410) 978-8865*