



**SB 702 – Behavioral Health Administration –
Behavioral Health Program Relocation Regulations**

Senate Finance Committee

March 10, 2026

POSITION: Letter of Information

The Community Behavioral Health Association of Maryland (CBH) files this letter of information to inform the Committee about the Department’s ongoing regulatory reform for behavioral health licensing, which offers the opportunity to simplify program relocation. Licensing delays are a significant concern for community providers, and CBH is optimistic that the Department is receptive to addressing those concerns.

CBH is the leading voice for community-based behavioral health providers in Maryland. Our 95 member organizations deliver all 23 behavioral health program types licensed by the Behavioral Health Administration (BHA). Collectively, our members have over 1,000 licenses from BHA, and delays in the licensing process over the past two years have posed significant challenges to our members’ operations.

The Behavioral Health Administration (BHA) is currently at work on revisions to licensing regulations. While the draft regulations do not currently reflect an expedited response or lighter review of site relocations, CBH and other stakeholders have advocated that the Department modify the draft regulations to allocate state resources more efficiently during the licensure process. This feedback has included raising oversight on new or weak providers through provisional licensing, while reducing the burden on compliant providers with an expedited process for relocations, mergers and other routine business operations. CBH believes that this approach to behavioral health licensing will create efficiencies for providers and more effective oversight at the state level.

It is our understanding that BHA intends to complete drafting 10.63 regulatory revisions within weeks, with a goal of publishing proposed regulations by May. We note that General Assembly has the power through the Joint Committee on Administrative, Executive and Legislative Review (AELR) to review regulations proposed by the Executive Branch, and it already exercised that authority when changes to the behavioral health licensing regulations were proposed last year without addressing stakeholder concerns.

CBH is optimistic that the Department is working to address stakeholder concerns in the development of regulatory changes, and believes that – at this stage of regulatory development – use of AELR review is a most appropriate tool to ensure that the behavioral health licensing process is both efficient and effective.

Thank you for your ongoing partnership and attention to the challenges facing behavioral health providers.

For more information, contact Nicole Graner, Director of Government Affairs and Public Policy, at Nicole@mdcbh.org.