

Change of Address Written Testimony (2).pdf

Uploaded by: Beth Ann Dorman

Position: FAV

Board Executive Committee

Leonard Wolf, RIA (Chair)
Alexa Seip (1st Vice Chair)
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Sharon Pepukayi, Ed.D. (Secretary)



FOR ALL SEASONS
Behavioral Health & Rape Crisis Center
— *Your Story Matters* —

Members-at-Large

Kamari Collins, Ed.D.
Bill Flook, Ph.D.
Sally Heckman, R.Ph.
Melissa Kelly
Carl Pergler
Craig Postlewait
Giovanni Wynn

February 20, 2026

The Honorable Heather Bagnall
Chair, House Health Committee
241 Taylor House Office Building
Annapolis, MD 21401

The Honorable Pamela Beidle
3 East Miller Senate Office Building
11 Bladen Street
Annapolis, MD 21401

Dear Chair Bagnall, Chair Beidle, and Members of the Committees:

For All Seasons writes in **support of HB922/SB702 - Behavioral Health Administration - Behavioral Health Program Relocation - Regulations.**

This legislation would require the Behavioral Health Administration (BHA) to adopt regulations authorizing a behavioral health program to relocate to another site. Currently, BHA requires established providers that are relocating their offices to apply for approval as a new applicant rather than providing a separate, more streamlined process for a simple change of address.

For All Seasons is a licensed behavioral health and rape crisis center that has served the State of Maryland for 40 years. We were recently impacted by the existing policy. Although our license number, leadership, and services were remaining the same, we were required to complete a new provider application and were placed in the same queue as new applicants. As a result, we were required to maintain two offices and pay duplicate lease payments for nearly one year. The delay also caused us to incur double operational costs for approximately four months. This created operational uncertainty and added undue burdens as they worked to ensure that clients did not experience service interruptions.

To avoid these delays in the future, we recommend that a distinct and expedited process for Change of Address Requests be created for existing licensed providers that are in good standing with BHA. This process could also include provisional operation approval once safety and compliance standards are met, allowing providers to transition without interruption of services. Having defined timelines and guidance specific to relocation requests would also help ensure transparency and consistency.

For these reasons, For All Seasons respectfully urges a **FAVORABLE** report on HB922/SB702.

Respectfully submitted,

Beth Anne Dorman
President & CEO

Change of Address Written Testimony (2).pdf

Uploaded by: Jeannie Haddaway-Riccio

Position: FAV

Board Executive Committee

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Dear Chair Bagnall, Chair Beidle, and Members of the Committees:

For All Seasons writes in **support of HB922/SB702 - Behavioral Health Administration - Behavioral Health Program Relocation - Regulations.**

This legislation would require the Behavioral Health Administration (BHA) to adopt regulations authorizing a behavioral health program to relocate to another site. Currently, BHA requires established providers that are relocating their offices to apply for approval as a new applicant rather than providing a separate, more streamlined process for a simple change of address.

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To avoid these delays in the future, we recommend that a distinct and expedited process for Change of Address Requests be created for existing licensed providers that are in good standing with BHA. This process could also include provisional operation approval once safety and compliance standards are met, allowing providers to transition without interruption of services. Having defined timelines and guidance specific to relocation requests would also help ensure transparency and consistency.

For these reasons, For All Seasons respectfully urges a **FAVORABLE** report on HB922/SB702.

Respectfully submitted,

Beth Anne Dorman
President & CEO

SB702_RHTC_FAV.pdf

Uploaded by: Therese Hessler

Position: FAV



March 10, 2026

Senate Finance Committee

Senate Bill 702 — Behavioral Health Administration – Behavioral Health Program Relocation – Regulations

Position: SUPPORT

Chair Beidle, Vice Chair Hayes, and Members of the Committee:

On behalf of the Recovery Housing & Treatment Center Coalition of Maryland (RHTC), we respectfully submit this testimony in support of Senate Bill 702, which requires the Behavioral Health Administration (BHA) to establish an expedited regulatory process for licensed behavioral health programs seeking to relocate to a new site.

RHTC represents behavioral health and recovery service providers across Maryland that deliver critical treatment and recovery supports for individuals with substance use and co-occurring disorders. Our members play a vital role in maintaining access to care, housing stability, and continuity of treatment for individuals working toward recovery.

Senate Bill 702 addresses a longstanding operational challenge within Maryland’s behavioral health licensing framework. Under current processes, providers relocating an existing program are often required to undergo procedures similar to those for establishing a new program, even when the services, staffing, ownership, and program model remain unchanged. These requirements can create significant administrative burdens, delays in service delivery, and financial risk for providers, ultimately affecting access to care for Maryland residents.

The bill’s requirement that BHA establish a separate and expedited relocation approval process represents an important and practical improvement. Provisions allowing the reuse of previously submitted documentation, consideration of a provider’s compliance history, and temporary approval to operate at a new location once life-safety requirements are met are particularly valuable. These measures recognize that established providers with strong compliance records should be able to relocate without unnecessary barriers while maintaining appropriate oversight and safety standards.



For recovery housing and treatment providers, relocation may occur for many legitimate reasons, including lease changes, zoning requirements, facility safety concerns, or program expansion to meet community needs. Delays in licensure approval during relocation can disrupt services, create instability for individuals receiving treatment, and place providers at financial risk.

Streamlining this process helps preserve continuity of care and supports system capacity at a time when behavioral health services are critically needed across the State.

RHTC also appreciates the bill's direction to the Behavioral Health Administration to provide clarity regarding timelines, requirements, and standards for relocation approvals. Predictable and transparent processes benefit both providers and regulators by reducing uncertainty and promoting compliance.

As the bill moves forward, RHTC encourages consideration of implementation details to ensure the intended benefits are realized. Clear timelines for review and approval, explicit criteria for temporary operating authority, and recognition of providers in good standing will be important components of effective regulations.

Overall, Senate Bill 702 represents a commonsense approach to improving administrative efficiency while maintaining regulatory oversight. Facilitating timely program relocation helps ensure Maryland residents continue to have access to essential behavioral health and recovery services without interruption.

For these reasons, the Recovery Housing & Treatment Center Coalition of Maryland respectfully urges a favorable report on Senate Bill 702. Thank you for your consideration.

For more information call or email:

Therese M. Hessler, Ashlar Government Relations | 301-503-2576 | therese@ashlargr.com

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Uploaded by: Meghan Lynch

Position: UNF



DEPARTMENT OF HEALTH

Wes Moore, Governor · Aruna Miller, Lt. Governor · Meena Seshamani, M.D., Ph.D., Secretary

March 10, 2026

The Honorable Pam Beidle
Chair, Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, MD 21401

RE: Senate Bill 702 – Behavioral Health Administration – Behavioral Health Program Relocation – Regulations– Letter of Opposition

Dear Chair Beidle and Committee Members:

The Maryland Department of Health (the Department) respectfully submits this letter of opposition for SB 702 – Behavioral Health Administration – Behavioral Health Program Relocation – Regulations. This legislation is expected to have an annual fiscal impact of over \$4 million from FY2027 through FY2031.

Effective October 1, 2026, SB 702 would require the Behavioral Health Administration (BHA) to promulgate regulations authorizing behavioral health programs to relocate to another site via expedited approval process for relocation, separate from the process to license new behavioral health programs. The expedited approval process would permit the use of previously submitted documentation if the information is unchanged or irrelevant to the relocation. The bill would further require temporary approval for a relocating behavioral health program if BHA determines that the new location meets life and safety standards. Finally, BHA would be required to consider the behavioral health program's regulatory record as a basis for streamlining the relocation review and approval process and issue clear timelines and standards for the relocation review.

BHA oversees the licensing of over 1,130 community-based behavioral health organizations across 5,508 sites. Creating a separate, expedited approval process will require the Administration to hire 8 additional staff to ensure that programs moving to new sites meet the requirements in the Code of Maryland Regulations (COMAR) 10.63 et. seq. and 10.21 et. seq. As you may know, BHA is currently engaged in a process to [substantially revise](#) COMAR 10.63, expanding the current nine chapters to 39 chapters, including program-specific site requirements. The Department expects to publish the regulations in Spring 2026. Thereafter, compliance standards related to health, safety, and welfare will change, limiting the effective use of current documentation.

Apart from regulatory changes, the Department notes that an expedited process that considers the regulatory history of providers may be challenging. The Department would need to adopt regulations and likely subregulatory guidance to clearly communicate with programs what

criteria and the period of lookback it will use as grounds for approving or denying an expedited approval. The bill does not contemplate an appeals process but the Department anticipates that providers would request access to a hearings process should such an expedited approval be denied.

Despite these challenges, the Department appreciates the bill's intention to make the relocation less burdensome for behavioral health programs. To that end, the Department believes it could offer an expedited process for providers relocating if such providers offered 90 days or more advance notice to the Department. With sufficient lead time, the Department could plan and prioritize processes to conduct site visits for relocating providers, which would reduce the time from application to approval.

Further, the Department is undergoing a comprehensive process to update the COMAR 10.63 regulations. As a part of this process, the Department plans to include regulatory provisions that allow for a streamlined application process for providers who are relocating or adding an additional program site. The Department believes these regulatory provisions will accomplish the intent of this legislation without a significant fiscal impact.

If you would like to discuss this further, please do not hesitate to contact Meghan Lynch, Director of Governmental Affairs at Meghan.Lynch@maryland.gov.

Sincerely,



Meena Seshamani, M.D., Ph.D
Secretary of Health

SB0702-CBH-LOI.pdf

Uploaded by: Nicole Graner

Position: INFO



**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.