

FAS Testimony - Clinical Intern Reimbursements.pdf

Uploaded by: Beth Ann Dorman

Position: FAV

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

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Kamari Collins, Ed.D.
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March 4, 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 **Senate Bill 910/House Bill1094 – Health Insurance - Graduate-Level Clinical Interns - Required Reimbursement.**

This legislation allows services rendered by graduate-level counseling, social work, and psychology clinical interns to be reimbursable under the following circumstances:

- The services are provided at an outpatient health care facility;
- The services are provided by a counseling clinical intern who is enrolled in a counseling graduate program; and
- The services are provided under the direct supervision of a licensed clinical professional counselor.

For All Seasons is a licensed behavioral health and rape crisis center that has served the State of Maryland for nearly 40 years. We provide the highest quality mental health and victim services to children, adults, and families across Maryland's Eastern Shore and beyond. Our services include therapy, psychiatry, victim advocacy, 24-hour crisis hotlines, outreach, and community education. Our unique model of care ensures that anyone can receive expert mental health care when they need it - regardless of language or ability to pay. Last year alone, we impacted thousands of lives on the Eastern Shore and across the state, delivering over 100,000 critical services.

Under current Maryland law, Masters-level behavioral health interns may only provide billable clinical services to Medicaid-insured clients under the supervision of a licensed provider within an Outpatient Mental Health Clinic (OMHC) setting.

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If a client loses Medicaid coverage or transitions to a private/commercial insurance plan, that client can no longer continue services with the intern, despite continuity of care being clinically recommended. This creates a disruption in therapeutic continuity for clients, reduces clinical training opportunities for future mental health professionals, and limits access to care for Marylanders.

In addition to reducing treatment disruption and improving client outcomes, passage of this legislation would expand access to care which is critical in the Rural Maryland communities we serve. It would also increase training capacity and readiness for future clinicians and help ensure that all clients, regardless of insurance type, can receive high quality, supervised mental health care.

For these reasons, For All Seasons respectfully urges a **FAVORABLE** report on **Senate Bill 910/House Bill 1094**.

Respectfully submitted,

BETH ANN DORMAN
President/CEO

MATOD 2026 - SB 910 FAV - Graduate-Level Clinical

Uploaded by: Connie Dausch

Position: FAV



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www.matod.org

Senate Health Committee
March 4, 2026

Senate Bill 910 – Health Insurance – Graduate-Level Clinical Interns – Required Reimbursement **FAVORABLE**

The state is currently experiencing a significant behavioral health workforce shortage. In 2024, the Maryland Health Care Commission stated that an additional 30,000 behavioral health workers will be needed by 2028 to meet the existing demand. This shortage includes graduate-level licensed providers such as counselors, clinical social workers, and psychologists, professions that are essential for substance use disorder (SUD) outpatient programs.

SUD outpatient programs (including Opioid Treatment Programs, or OTPs) are facing critical clinician shortages across the state. This impacts access to care, leading to longer waitlists, delayed treatment, and increased strain on existing staff. For individuals seeking care for SUDs, delays in treatment can be serious and life-threatening.

Graduate-level interns are a solution to improving access to care, particularly for underserved and high-need populations. When appropriately supervised by licensed clinicians, interns provide high-quality services while gaining the experience necessary to become fully licensed providers. Internships in this field often evolve into full time employment once the intern graduates and attains their license.

By enabling SUD outpatient programs to receive reimbursement for services delivered by supervised graduate interns, SB910 would help address Maryland's behavioral health workforce shortage. Reimbursement allows programs to expand their capacity to train interns, reduce the financial burden associated with supervision, and invest in developing the next generation of licensed professionals. This policy supports both immediate access to care and long-term workforce sustainability.

Additionally, SB910 would assist to reduce provider shortage and increase access to care while Maryland's Board of Professional Counselors (BoPC) is experiencing extended delays in processing and approving counselor and trainee applications. An application for an Alcohol and Drug Trainee (ADT) can take at least three months to process and approve, and often longer; these timelines restrict the ability for OTPs to onboard graduate interns and other potential employees who would be otherwise qualified to provide billable services under clinical supervision.

Maryland already recognizes this model in other settings. Outpatient Mental Health Clinics (OMHCs) are currently permitted to bill for services provided by supervised interns. SB910 extends this existing framework to SUD outpatient programs.

For these reasons, MATOD respectfully urges favorable consideration of SB 910.

MATOD members include community and hospital based Opioid Treatment Programs, local Health Departments, local Addiction and Behavioral Health Authorities and Maryland organizations that support evidence-based Medication Assisted Treatment. MATOD members include thousands of highly trained and dedicated addiction counselors, clinical social workers, physicians, nurse practitioners, physician assistants, nurses, peer recovery specialists and dedicated staff who work every day to save and transform lives.

Employer and institutional affiliations are provided for identification purposes only and do not convey employer and institutional positions

SB910 Health Insurance - Graduate-Level Clinical I

Uploaded by: Dean Judy Postmus

Position: FAV

Testimony for SB 910
Health Insurance - Graduate-Level Clinical Interns - Required Reimbursement
March 4, 2026
Support

Thank you, Chair Beidle, Vice Chair Hayes, and members of the Finance Committee for addressing this important issue and recognizing the vital role and contributions of graduate social work students in Maryland. As dean of the University of Maryland, School of Social Work, I appreciate the opportunity to provide testimony in strong support of SB 910, legislation that would ensure reimbursement for behavioral health services provided by graduate-level social work clinical interns when those services are delivered under appropriate clinical supervision, and are billed through a Licensed Certified Social Worker-Clinical (LCSW-C).

The University of Maryland School of Social Work educates the majority of social workers in Maryland and Graduate-Level Social Work Interns are highly skilled emerging professionals. During their graduate school program, they engage in rigorous coursework and field practicum experiences which provide in-depth training under the supervision of experienced social workers. In their advanced year of the MSW program students are placed in agencies throughout Maryland serving clients three full days per week, under the supervision of a licensed social worker. Reimbursing for supervised intern-provided services helps stabilize outpatient clinics, supports training sites, and expands capacity at a time when behavioral-health needs are at historic highs.

SB 910 supports workforce development AND patient access. Maryland faces well-documented shortages of behavioral-health providers. Waitlists for therapy routinely stretch weeks to months, especially for youth, Medicaid patients, and individuals in under-resourced communities. Social work interns are an essential part of the behavioral health workforce pipeline. Coursework and practicum experiences in areas such as assessment, ethics, trauma-informed care, social work techniques, multicultural competence, and evidence-based interventions equip graduates with the skills and knowledge to provide high-quality and ethical services. SB 910 reflects a commitment to enhancing access of clinical services while protecting public safety.

Another benefit of SB 910 is that it will provide additional placement sites from agencies who currently do not provide these placements because of the financial disadvantage and loss when providing services without reimbursement to the agency. These interns do not function as untrained paraprofessionals. They are pre-licensed clinicians, already equipped with foundational counseling skills and theoretical knowledge, and they deliver care under the direct, ongoing supervision of licensed, experienced LCSW-Cs. This supervision includes review of clinical notes, observation of sessions, case consultations, and adherence to ethical standards of the social work profession.

Reimbursement for services delivered by supervised graduate-level social work interns is not only clinically responsible—it is necessary to maintain access to behavioral health care and support Maryland's social work workforce. This is sensible, low-risk, high-impact legislation that benefits patients, providers, and the entire behavioral health system.

I respectfully request a favorable committee report on SB 910.

Respectfully submitted by,



Judy L. Postmus, Ph.D., ACSW, Dean & Professor

Cc: Senator Johnny Mautz

JA Testimony for Senate Bill 910_ Health Insurance

Uploaded by: Jordan Anderson

Position: FAV

Senate Bill 910: Health Insurance – Graduate-Level Clinical Interns – Required
Reimbursement
March 4, 2026
Position: SUPPORT

Chair and Members of the Senate Finance Committee,

My name is Jordan Anderson, a social worker in higher education, where my primary responsibility is securing internship placements for graduate level social work students across the State of Maryland.

In nearly every placement interview I have conducted, students shared they aspire to work with community members navigating one or more mental health diagnoses, by providing treatment modalities to children, youth, and families.

And almost immediately after making placement recommendations, they explain that they cannot afford to stop working to obtain their educational goals.

Our accrediting body mandates students to accrue internship hours during operating hours of the assigned agency and are required for graduation. Students must meet these requirements while continuing to support themselves and, in many cases, their families.

The strain shows up in MSW students enduring financial instability, academic disruption, and emotional exhaustion for a degree that strengthens individuals in our Maryland communities.

I share this not only as an administrator, but from lived experience. While completing my second year social work internship, 24 hours per week, in an outpatient mental health clinic housed within an elementary/middle school, I provided billable services to insured clients without compensation or reimbursement. I was also working two part time jobs and attending graduate school full time.

If this legislation was proposed and passed prior to 2018, I personally could have benefited from this. Unfortunately, for years the burden has simply been normalized for social work students while costs continue to rise and that must change.

I stand in support of Senate Bill 910.

This bill creates a pathway for reimbursement when graduate clinical interns provide supervised services in outpatient settings. Students are already delivering billable mental

health services under licensed supervision. This legislation aligns reimbursement with the work that is already being performed and ensures students are not required to sacrifice their financial stability in order to complete required clinical training.

By enabling reimbursement, Senate Bill 910 strengthens Maryland's growing behavioral health workforce and modernizes how we train future social work clinicians.

I respectfully urge a favorable report on Senate Bill 910.

Thank you for your time and consideration.

All the best,

Mrs. Jordan Anderson, Licensed Master Social Worker (LMSW)

NASW Maryland - 2026 SB 910 FAV - Graduate-Level C

Uploaded by: Karessa Proctor

Position: FAV



Senate Finance Committee

Senate Bill 910: Health Insurance – Graduate-Level Clinical Interns – Required Reimbursement

March 4, 2026

Position: SUPPORT

Chair and Members of the Senate Finance Committee:

On behalf of the National Association of Social Workers Maryland Chapter (NASW-MD), representing more than 2,600 social workers across the state, we respectfully submit this testimony in strong support of Senate Bill 910.

NASW-MD supports SB 910 because it strengthens Maryland’s behavioral health workforce pipeline while expanding access to care for Marylanders. This bill establishes that insured individuals are entitled to reimbursement for services rendered by graduate-level counseling, social work, or psychology clinical interns under appropriate supervision. Importantly, this legislation does **not** provide direct payment to interns. Rather, it ensures that the services they provide as part of accredited educational programs are recognized and reimbursable under health insurance policies.

This distinction matters!

Graduate-level clinical interns are working toward advanced degrees that require extensive supervised field education. Social work students, for example, complete hundreds of hours of practicum in community mental health clinics, hospitals, schools, and private practices. These interns are providing real services to real clients under the supervision of licensed professionals. Yet, in many cases, agencies are unable to bill for those services, limiting placement opportunities and constraining service delivery capacity.

By requiring reimbursement for services delivered by supervised interns, SB 910 would:

- **Expand Access to Behavioral Health Services:** Maryland continues to face a behavioral health workforce shortage. Allowing insurers to reimburse for services provided by supervised interns increases provider capacity in clinics and community-based settings. This is especially critical in rural and underserved communities where access gaps are most pronounced.

(over)



- **Strengthen the Educational Value of Clinical Degrees:** When insurance companies recognize and reimburse services delivered by supervised interns, it affirms the rigor and legitimacy of graduate-level clinical training programs. This strengthens the professional degree and ensures students are integrated into systems of care in a meaningful way.
- **Increase Practicum Opportunities for Students:** Agencies are more likely to accept interns when there is a sustainable financial model attached to supervision and service delivery. SB 910 may open the door to more diverse and robust field placements, ensuring students gain high-quality clinical experience while meeting community needs.
- **Support Ongoing “Pay for Placement” Efforts:** NASW-MD has long advocated for solutions to the financial strain placed on graduate students who are required to complete unpaid practicums. While SB 910 does not directly compensate interns, it creates financial infrastructure within agencies that could make stipends or other forms of student support more feasible. This bill moves Maryland closer to addressing the broader “Pay for Placement” issue by ensuring agencies are not financially penalized for training the next generation of clinicians.

Field education is the signature pedagogy of social work. It is where theory meets practice, and where students develop the clinical competence necessary to serve Maryland families. SB 910 recognizes that supervised interns are part of the care continuum and that their services contribute meaningfully to public health outcomes.

For these reasons, NASW-MD respectfully urges a favorable report on Senate Bill 910.

Thank you for your consideration and for your continued commitment to strengthening Maryland’s behavioral health workforce.

Respectfully submitted,

Karessa Proctor, BSW, MSW

Executive Director

National Association of Social Workers – Maryland Chapter

SB 910 Letter - Support.pdf

Uploaded by: Taylor Dickerson

Position: FAV



March 2, 2026

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Senator Antonio Hayes, Vice Chair
Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, MD 21401

RE: SB 910 – Health Insurance – Graduate-Level Clinical Interns- Required Reimbursement

Position: SUPPORT

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

The Maryland Psychological Association, (MPA), which represents over 1,000 doctoral level psychologists throughout the state, asks the Senate Finance Committee to **report favorably on SB 910**.

Senate Bill 910 addresses a critical workforce and access-to-care issue in Maryland by ensuring reimbursement for services provided by graduate-level counseling, social work, and psychology clinical interns when those services are delivered within outpatient settings and under the direct supervision of licensed professionals. At a time when Maryland faces significant shortages of behavioral health providers, this legislation removes unnecessary barriers that limit patient access to timely, appropriate care.

The graduate-level clinical interns covered by SB 910 are not unsupervised trainees; they are enrolled in accredited graduate programs and provide services only under the direct supervision of fully licensed professionals who remain responsible for the quality and appropriateness of care. Services are billed by the supervising licensed provider, ensuring clinical accountability, adherence to professional standards, and continuity of care. These interns are already delivering lawful, evidence-based services within their scope of training, and their work is an essential component of the behavioral health care delivery system.

By requiring reimbursement for these supervised services, SB 910 supports patients, providers, and the broader health care system. Patients benefit from expanded access and reduced wait times, particularly in underserved communities. Supervising clinicians and outpatient facilities gain the ability to sustain training programs that are essential to developing Maryland's future workforce. SB 910 reflects a balanced, responsible approach that recognizes the rigorous training and supervision of graduate-level clinical interns while promoting access, affordability, and continuity of behavioral health care across the state.

For these reasons, the Maryland Psychological Association respectfully urges the Senate Finance Committee to provide **a favorable report on SB 910**. If we can provide any additional information or be of any assistance, please do not hesitate to contact the Chair of MPA's Legislative Committee, Dr. Stephanie Olarte, at mpalegislativcommittee@gmail.com.

Respectfully submitted,

Stephanie Wolf, JD, Ph.D.
Stephanie Wolf, JD, Ph.D.
President

Stephanie Olarte, Ph.D.
Stephanie Olarte, Ph.D.
Chair, MPA Legislative Committee

cc: Barbara Brocato & Dan Shattuck, MPA Government Affairs

2026 MCHS SB 910 Senate Side.pdf

Uploaded by: Michael Paddy

Position: FWA



Maryland Community Health System

Committee:	Senate Finance Committee
Bill:	Senate Bill 910 - Health Insurance - Graduate-Level Clinical Interns - Required Reimbursement
Hearing Date:	March 4, 2026
Position:	Support with Amendment

The Maryland Community Health System supports *Senate Bill 910 - Health Insurance - Graduate Level Clinical Interns - Required Reimbursement*. The legislation clarifies that insurers cover services provided by graduate students in behavioral health clinical education programs if they are being supervised by a licensed provider.

MCHS is a network of federally qualified health centers providing somatic, behavioral health, and dental care to underserved communities across Maryland. Federally qualified health centers also play an important role in supporting the clinical training of students in multiple disciplines including in the behavioral health field. We support this legislation because it recognized that clinical services provided by supervised students should be reimbursable by insurance, otherwise clinical training programs are not sustainable.

We would ask for two clarifying amendments to: 1) Make it clear that federally qualified health centers are included in the definition of outpatient facilities in the bill; and 2) Recognize marriage and family therapy graduate students, just as the bill already recognizes clinical social work, professional counseling, and psychology graduate students.

Thank you for consideration of our testimony. If we can provide any additional information, please contact Michael Paddy at mpaddy@policypartners.net.

Maryland Community Health System
Proposed Amendments to SB 910

Amendment 1 -

Page 2, line 17, after "FACILITY" add "INCLUDING FEDERALLY QUALIFIED HEALTH CENTERS."

Page 3, line 15, after "FACILITY" add "INCLUDING FEDERALLY QUALIFIED HEALTH CENTERS."

Page 4, line 14, after "FACILITY" add "INCLUDING FEDERALLY QUALIFIED HEALTH CENTERS."

Amendment2 -

Page 2, after line 24 add:

(D) (1) SUBJECT TO PARAGRAPH (2) OF THIS SUBSECTION, IF A POLICY, CONTRACT, OR CERTIFICATE SUBJECT TO THIS SECTION PROVIDES FOR REIMBURSEMENT OF A SERVICE THAT IS WITHIN THE LAWFUL SCOPE OF PRACTICE OF A LICENSED GRADUATE MARRIAGE AND FAMILY THERAPIST, THE INSURED OR ANY OTHER PERSON COVERED BY THE POLICY, CONTRACT, OR CERTIFICATE IS ENTITLED TO REIMBURSEMENT FOR THE SERVICE PROVIDED BY A GRADUATE-LEVEL MARRIAGE AND FAMILY THERAPIST CLINICAL INTERN.

(2) THE SERVICES PROVIDED UNDER THIS SUBSECTION SHALL BE REIMBURSABLE IF THE SERVICES ARE:

(I) PROVIDED AT AN OUTPATIENT HEALTH CARE FACILITY INCLUDING FEDERALLY QUALIFIED HEALTH CENTERS;

(II) PROVIDED BY A MARRIAGE AND FAMILY THERAPIST CLINICAL INTERN WHO IS:

1. ENROLLED IN A MARRIAGE AND FAMILY THERAPIST GRADUATE PROGRAM; AND

2. PROVIDING THE SERVICES UNDER THE DIRECT SUPERVISION OF A LICENSED CLINICAL MARRIAGE AND FAMILY THERAPIST; AND

(III) BILLED BY THE SUPERVISING LICENSED CLINICAL MARRIAGE AND FAMILY THERAPIST.

SB 910 - Health - BPCT - SWA.docx (2).pdf

Uploaded by: State of Maryland (MD)

Position: FWA



DEPARTMENT OF HEALTH

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

Maryland Board of Professional
Counselors and Therapists
4201 Patterson Avenue
Baltimore, Maryland 21215

2026 SESSION POSITION PAPER

BILL NO: SB 910

COMMITTEE: Finance

POSITION: Support with Amendments

TITLE: Health Insurance – Graduate-Level Clinical Interns – Required Reimbursement

BILL ANALYSIS: SB 910 establishes that insureds and covered persons under certain health insurance policies are entitled to reimbursement for services rendered by a graduate-level counseling, social work, or psychology clinical intern under specified circumstances. The bill requires that services be provided in an outpatient health care setting, under direct supervision, and billed by the supervising licensed professional.

POSITION AND RATIONALE: The Maryland Board of Professional Counselors and Therapists (the “Board”) supports SB 910 with amendments.

The Board recognizes the importance of expanding access to behavioral health services and acknowledges the role that graduate-level clinical interns play in delivering supervised care within outpatient settings. Reimbursement for services rendered under appropriate supervision may enhance workforce development and improve patient access to care.

However, the Board recommends an amendment to clarify that the bill applies to graduate-level clinical interns across each discipline regulated under Title 17 of the Health Occupations Article. These disciplines include professional counseling, marriage and family therapy, alcohol and drug counseling, and professional art therapy. This clarification would ensure consistency in application and avoid unintended exclusion of interns in disciplines overseen by the Board; while maintaining flexibility should additional disciplines fall under the Board’s jurisdiction in the future.

The Board’s recommendation is intended to promote equitable treatment of interns across regulated professions, maintain clarity in implementation, and support continuity of care while preserving appropriate supervisory safeguards.

The Board stands ready to work with stakeholders to ensure the bill is implemented in a manner that supports patient safety, professional supervision standards, and workforce development.

Thank you for consideration of this testimony. The Board of Professional Counselors and Therapists respectfully requests a favorable vote on SB 910 with amendments.

If you require additional information please contact Tomiloba Olaniyi Quadri, Executive Director of the Maryland Board of Professional Counselors and Therapists at (410) 764-4732 or tomiloba.olaniyi-quadri@maryland.gov; or Lillian Reese, Board Legislative Liaison, at (443) 794-4757 or lillian.reese@maryland.gov.

The opinion of the Board expressed in this document does not necessarily reflect that of the Department of Health or the Administration.