

inseparable

March 12, 2026

House Health Committee
240 Taylor House Office Building
Annapolis, Maryland 21401

Via electronic submission

RE: Support for House Bill 1094 (Health Insurance- Graduate Level Clinical Interns- Required Reimbursement)

Chair Bagnall, Vice Chair Cullison, and Members of the Committee:

On behalf of Inseparable, a national nonprofit organization focused on closing the treatment gap for individuals with mental health and substance use conditions, I write in support of HB 1094. This bill will strengthen the behavioral health workforce by allowing graduate-level interns in the field of social work, psychology and counseling to be reimbursed for services, as long as they are under appropriate supervision.

Behavioral Health Workforce Challenges in Maryland

Behavioral health workforce shortages remain a pressing issue in Maryland. While the state has made important progress in recent years, many communities continue to face challenges recruiting and retaining behavioral health clinicians.

While there is continued demand for behavioral health services, many providers remain on fragile financial footing while working to meet this growing need. Policies that help providers sustain training programs and receive reimbursement for services already being delivered can help maintain and expand the workforce pipeline.

The Maryland General Assembly has taken meaningful steps to address these shortages. In 2023, the legislature enacted Senate Bill 283, establishing the Behavioral Health Workforce Investment Fund to strengthen and expand the behavioral health workforce pipeline. These investments are already making a difference. The number of mental health workforce shortage

areas has decreased from 22 to 10 jurisdictions designated as whole or partial shortage areas.¹²

How HB 1094 Strengthens the Behavioral Health Workforce

HB 1094 represents an important next step in building on this progress. The bill ensures that individuals covered under certain health insurance policies may receive reimbursement for behavioral health services delivered by graduate-level clinical interns when those services fall within the lawful scope of practice of licensed professionals.

Importantly, the bill includes clear safeguards to ensure quality and appropriate supervision. Under the legislation, services provided by graduate-level interns are reimbursable only when:

- The services are provided in an outpatient health care facility;
- The intern is enrolled in an accredited graduate program in counseling, social work, or psychology;
- The services are delivered under the direct supervision of a licensed clinician; and
- The services are billed by the supervising licensed professional.

HB 1094 supports recommendations outlined in the report “Investing in Maryland’s Behavioral Health Talent.” The report highlights the need to modernize the training pipeline and create opportunities for professionals to gain experience while earning income.

By enabling reimbursement for supervised graduate interns, HB 1094 supports this “earn and learn” model, helping students gain meaningful clinical and administrative experience while strengthening the provider organizations that train Maryland’s future behavioral health workforce. HB 1094 represents a pragmatic step that supports providers, strengthens the workforce pipeline, and expands access to behavioral health care. Thank you for your consideration of HB 1094 and for the above mentioned reasons, I urge a favorable report.

Sincerely,



Marianne Gibson

Vice President, Youth, Crisis and Workforce Policy

¹https://marylandmatters.org/wp-content/uploads/2024/11/Full-Report_Maryland-BH-Workforce-Assessment-Final-Oct-2024.pdf

² <https://www.ruralhealthinfo.org/charts/7?state=MD>