



Tuesday, March 24, 2026

The Honorable Heather Bagnall
Chair, Health Committee
Maryland House of Delegates
Annapolis, Maryland 21401

The Honorable Bonnie Cullison
Vice Chair, Health Committee
Maryland House of Delegates
Annapolis, Maryland 21401

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

On behalf of the Behavioral Health Action Team (BHAT) of the Healthy St. Mary's Partnership (HSMP), we write to express our strong support for *Senate Bill 205 - Health Insurance - Mental Health and Substance Use Disorders - Codification of Federal Requirements*. HSMP is the Local Health Improvement Coalition (LHIC) serving St. Mary's County, Maryland. Through BHAT, we work collaboratively with community partners to improve mental health outcomes, strengthen substance use prevention and treatment systems, and promote equitable access to high-quality behavioral health services across our region.¹ SB 205 directly aligns with these priorities by codifying critical mental health parity protections into Maryland State law, ensuring that residents with behavioral health conditions receive insurance coverage on equal terms with those seeking medical or surgical care.

As a rural jurisdiction, St. Mary's County faces unique challenges, including provider shortages, transportation barriers, and limited specialty networks. Even when individuals have insurance coverage, access to care may be delayed or restricted by nonquantitative treatment limitations (NQTLs) such as prior authorization requirements, narrow provider networks, or utilization review practices that are more restrictive for behavioral health than for medical or surgical care. When these barriers delay or deny access to outpatient therapy, medication, or substance use treatment, individuals may deteriorate and ultimately present in crisis settings such as emergency departments or the criminal legal system. Behavioral health has been identified as a top priority in our Community Health Improvement Plan, and these insurance barriers directly undermine our local efforts to connect residents with the services they need.²

¹ The Centers of Excellence (2025, April). *Sequential Intercept Model Mapping Report for St. Mary's County, Maryland*. Governor's Office of Crime Prevention and Policy.

<https://smchd.org/wp-content/uploads/FINAL-St.-Marys-Co.-2025-SIM-Mapping-Report.pdf>

² The Healthy St. Mary's Partnership (2025, January). *Health St. Mary's 2026*.

<https://healthystmarys.com/wp-content/uploads/2025/06/Healthy-St.-Marys-2026-2025-update.pdf>

SB 205 takes an important step toward addressing these barriers. The bill codifies key provisions of the 2024 federal Mental Health Parity Rule into State law, giving the Maryland Insurance Administration (MIA) clear authority to enforce parity requirements regardless of changes at the federal level. This is especially important given the federal government's May 2025 announcement that it would no longer enforce the 2024 Final Rule, and that the rule may be revised or rescinded entirely.³ By anchoring these protections in Maryland law, SB 205 ensures that carriers cannot use discriminatory NQTLs to limit access to behavioral health benefits, must collect and evaluate data on whether their plan designs create disparate access to behavioral health care, and must provide meaningful benefits for covered mental health and substance use disorder conditions on par with medical and surgical services.⁴

For BHAT, equitable insurance coverage is foundational to achieving our local health improvement goals.⁵ Strengthening parity enforcement will support expanded access to outpatient and community-based behavioral health services. This reduces reliance on emergency departments and crisis intervention - systems that can be especially strained in rural counties - and promotes earlier, more effective care for St. Mary's County residents. SB 205 ensures that the insurance plans held by our community members deliver on the behavioral health benefits they are promised.

SB 205 reflects an important commitment that Marylanders seeking behavioral health care deserve the same standard of insurance coverage as those seeking any other medical care. For these reasons, the Behavioral Health Action Team of the Healthy St. Mary's Partnership respectfully urges the House Health Committee to issue a favorable report on SB 205. Thank you for your leadership and continued commitment to strengthening Maryland's behavioral health system.

Sincerely,



Chris Shea
Healthy St. Mary's Partnership
Behavioral Health Action Team Co-Chair



Jodi Gardiner
Healthy St. Mary's Partnership
Behavioral Health Action Team Co-Chair

³Maryland General Assembly (2026). *Senate Bill 205 – Fiscal and Policy Note (Third Reader)*, p. 4 (Background). https://mgaleg.maryland.gov/2026RS/fnotes/bil_0005/sb0205.pdf

⁴Maryland General Assembly (2026). *Senate Bill 205 – Fiscal and Policy Note (Third Reader)*, pp. 3–4. Department of Legislative Services. https://mgaleg.maryland.gov/2026RS/fnotes/bil_0005/sb0205.pdf

⁵The Healthy St. Mary's Partnership (2025, January). *Healthy St. Mary's 2026*, pp. 8–9 (Behavioral Health Strategies). <https://healthystmarys.com/wp-content/uploads/2024/01/Healthy-St.-Marys-2026-January-2024-Updated.pdf>