



Greater Washington Society for Clinical Social Work

House Health Committee

February 26, 2026

House Bill 917 – *Health Insurance – Retroactive Denial of Reimbursement*

POSITION: SUPPORT

The Greater Washington Society for Clinical Social Work (GWSCSW) was established in 1975 to promote and advance the specialization of clinical practice within the social work profession. Through our lobbying, education, community building, and social justice activities, we affirm our commitment to the needs of those in our profession, their clients, and the community at large. On behalf of the Maryland Legislation and Advocacy Committee of GWSCSW, we **support** House Bill 917.

As Licensed Certified Social Workers-Clinical (LCSW-Cs) providing essential behavioral health services across Maryland, we understand firsthand the financial and administrative challenges faced by small and solo practices. Mental health professionals are particularly vulnerable to the effects of retroactive denials. Behavioral health clients are more likely to seek out-of-network care or encounter coverage limitations, increasing the complexity of billing and reimbursement. Many LCSW-Cs operate independently or within small group settings, often with limited administrative infrastructure and narrow operating margins. Delayed or retroactively denied reimbursement from insurance carriers places significant strain on these practices and ultimately threatens patient access to care.

Currently, health insurance carriers may retroactively deny reimbursement up to six months after payment has been issued. This prolonged window creates instability and uncertainty for providers who have rendered services in good faith, documented them appropriately, and already received payment. When funds are recouped months later, often due to technical billing or protocol issues rather than clinical concerns, providers face unexpected financial hardship. For small practices, even a single large recoupment can disrupt payroll, overhead expenses, and continuity of services.

House Bill 917 offers a balanced and reasonable solution by shortening the timeframe for retroactive denials to three months after the date of service, provided the carrier has delivered appropriate training on billing protocols, standards, and compliance requirements. Insurance carriers have efficient means to communicate requirements, disseminate training materials, and identify billing discrepancies in a timely manner. It is both fair and feasible to expect carriers to act within a shorter, clearly defined timeframe. Requiring carriers to provide training ensures that providers are not penalized for misunderstandings or unclear billing expectations and promotes transparency, accountability, and collaboration between insurers and providers. **GWSCSW also emphasizes the importance of making these trainings accessible in multiple formats, available on an ongoing basis, and not limited to one-time or time-restricted offerings.**

House Bill 917 establishes a more manageable and equitable framework for reimbursement, while maintaining appropriate oversight and compliance standards. By shortening the retroactive denial window and requiring insurer-provided training, this legislation promotes fairness, financial stability for providers, and continued access to behavioral health care for Maryland residents. For these reasons, GWSCSW urges a favorable report.

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