

**House Bill 995**  
**Health Occupations - Behavioral Health Care Providers - Use of Artificial Intelligence**  
Health Committee  
February 25<sup>th</sup> 2026  
**Favorable with Amendments**

**Catholic Charities supports with amendments HB995**, which seeks to place parameters on the use of artificial intelligence (AI) by behavioral health providers, including:

1. Prohibiting behavioral health care providers from using AI to directly provide behavioral health care to a patient;
2. Authorizing providers to use AI systems for administrative support tasks under certain circumstances; and
3. Requiring providers to obtain informed consent from patients if AI systems are used under certain circumstances.

For over a century, Catholic Charities has provided care and services to improve the lives of Marylanders in need. We accompany Marylanders as they age with dignity, support their pursuit of employment and career advancement, heal from trauma and addiction, achieve independence, prepare for educational success, and welcome immigrant neighbors into Maryland communities.

Catholic Charities' Villa Maria Behavioral Health program is the second-largest nonprofit provider of behavioral health services in Maryland. **Our 225 counselors and psychiatric rehabilitation specialists serve more than 3,500 patients across eight Maryland counties and Baltimore City through community schools, stand-alone clinics, and telehealth.**

**Given the overwhelming need for behavioral health and substance use treatment, and the significant workforce shortage, AI can be a valuable administrative support tool.** For example, AI can help ensure documentation complies with standards of care and billing regulations by identifying overlapping services, preventing duplication of notes, and assisting with translation. However, AI could be harmful if misused in treatment or clinical decision-making. We agree with the bill's intent to prohibit AI from delivering care or replacing clinical judgment.

At the same time, it is important that consent requirements and compliance mechanisms are clearly defined and workable, so they do not create unintended burdens that reduce access to care. To ensure HB995 achieves its intended purpose without placing undue administrative strain on providers or patients, we respectfully request the following amendments:

### **1. Clarify Compliance and Supervisory Use of AI**

The bill should explicitly permit the use of AI for internal compliance, quality assurance, and supervisory review.

Given the high volume of clients and staff in large behavioral health programs, AI tools can be extremely helpful in conducting internal compliance reviews and ongoing quality improvement. These uses are administrative in nature and strengthen patient protections by promoting accurate documentation and adherence to billing and clinical standards. The statute should clearly recognize and allow this type of use.

## 2. Clarify Disclosure and Consent Requirements for Administrative AI Use

Allow for a **one-time written disclosure and acknowledgment at the start of treatment** covering current and future administrative AI uses, rather than requiring consent at each visit; and define what constitutes sufficient disclosure for administrative tools.

This clarification is important because many third-party software platforms now incorporate AI components in ways that are not always transparent at the user level. While our agency carefully vets software products and currently uses limited AI-enabled tools, none of which independently manage client data, it is reasonable to anticipate that AI will become embedded in many standard systems.

Requiring repeated, service-specific consent for each embedded AI function would be impractical and could disrupt care without enhancing patient protection. Clear statutory guidance on disclosure standards will protect patients while preserving workable clinical operations.

## 3. Provide Clear Enforcement and Documentation Standards

If the State intends to regulate AI usage, the law should also clearly outline:

- What constitutes noncompliance; and
- Which entity is responsible for oversight and enforcement.

Currently, most documentation platforms do not include a mechanism to label specific portions of a note as “AI-supported.” Without clear guidance, providers will lack a consistent way to demonstrate compliance.

If agencies are to be held accountable for AI use, the State should establish clear, feasible standards to ensure expectations are uniform and enforceable.

HB995 is an important and thoughtful effort to protect patients while acknowledging the evolving role of technology in health care. With the clarifying amendments outlined above, the bill can both safeguard clinical integrity and allow responsible administrative innovation.

For these reasons, Catholic Charities of Baltimore respectfully urges the Committee to issue a **favorable report with amendments** on HB995.

Submitted By: Madelin Martinez, Assistant Director of Advocacy on behalf of Karen Kleeman-Jones, VMBH Director of Operations