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Health and Government Operations  
Committee

*Subcommittees*

Public Health and  
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Health Occupations and  
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THE MARYLAND HOUSE OF DELEGATES  
ANNAPOLIS, MARYLAND 21401

**Testimony**

**HB 1094 Health Insurance- Graduate Level Clinical Interns- Required Reimbursement**

**Health Committee**

**Friday, March 13, 2026**

**What This Bill Does**

**HB1094** authorizes masters-level behavioral health interns, working within approved supervised placements, to provide clinical services reimbursable under private and commercial insurance plans. By utilizing the National Provider Identifier (NPI) of a licensed rendering provider—limited to an LCSW-C or LCPC who directly supervises and signs off on all documentation, this bill will require private and commercial insurers to utilize a structured "incident-to" billing model for services rendered by clinical interns. This alignment allows the licensed supervisor to assume full clinical and billing responsibility while expanding the reach of vital mental health services across Maryland.

**Why We Need This Bill**

Currently, Maryland's regulatory framework creates an arbitrary barrier to care. Masters-level interns (MSW and Professional Counseling programs) are permitted to provide billable services only to Medicaid-insured clients within Outpatient Mental Health Clinic (OMHC) settings. This creates a "benefits cliff" for patients: if a client gains employment and transitions from Medicaid to private insurance, they are legally forced to terminate their relationship with their intern therapist, even if they are in the middle of a clinical breakthrough. This disruption in therapeutic continuity is clinically detrimental and ignores the fact that these students are operating under the exact same rigorous supervision regardless of the client's insurance type.

Beyond individual patient care, HB1094 addresses Maryland's critical behavioral health workforce shortage. By allowing private practices and group settings to participate in the training of the next generation of clinicians, we increase the state's overall capacity for care. This bill ensures that all Marylanders, regardless of their insurance provider, have access to high-quality, supervised behavioral health support. By supporting this bill, we are investing in the clinical

readiness of future professionals while ensuring that no Marylander is forced to abandon a successful course of treatment due to a change in insurance coverage.

I respectfully ask the Committee for a favorable vote on **HB1094**.