

**Testimony of the
Baltimore City Board of School Commissioners
In Opposition of
House Bill 740
Public Schools – School Based Mental Health Services – Full-Time Therapists**

February 18, 2026

The Baltimore City Board of School Commissioners understands the sponsors need to ensure that all students receive appropriate mental health services. If the primary intent of this legislation is to ensure a mental health therapist in all schools, it must be amended to recognize that our existing staff fall under the umbrella of being a therapist, but through a different licensure board. **As drafted this proposed legislation would cost upwards of \$20 million to implement.** Implementation of this legislation as a 1.0 FTE LCPC would have tremendous practical challenge because there are staffing shortages already existing in almost every related service area.

Some important highlights regarding City Schools' existing and extensive investments in the area of mental health supports for students:

- We already staff a full-time social worker in every building.
- Schools already have guidance counselors, per COMAR requirement.
- We also have school psychologist staff and contract workers.
- We currently already pay for Expanded School Behavioral Health (ESBH) which focuses on in-school mental health.
- Schools also have school-based student wholeness teams which support mental health and trauma-informed care

Again, while these existing staff – due to their licensing boards – do not meet the requirements of the bill as drafted, it is important to understand that Baltimore City Schools is already, at minimum, meeting the intended spirit of the bill, and arguably, meeting requirements well beyond the bill's intent.

For background, the Baltimore City School Board does not employ LCPCs as a district. If the bill's language were amended to include licensure under the Department of Health and Mental Hygiene, our social workers and school psychologists would be included. Please note we only employ five school psychologists with LCPC licensure, but they don't practice under that license because the school system cannot bill for assessments under that licensure.

The bill, as drafted, is quite limited in that it requires placement of LCPCs in all schools. While City Schools has invested significantly in school social workers and counselors, they would not qualify as meeting the bill's requirements.

For the foregoing reasons, the Baltimore City Board of School Commissioners opposes House Bill 740 and urges an unfavorable report

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