



STATE OF MARYLAND

Community Health Resources Commission

45 Calvert Street, Room 336 • Annapolis, Maryland 21401

Larry Hogan, Governor - Boyd Rutherford, Lt. Governor
Elizabeth Chung, Chair – Mark Luckner, Executive Director

February 25, 2020

The Honorable Bonnie Cullison
House of Delegates
312 House Office Building
6 Bladen Street
Annapolis, MD 21401

Dear Delegate Cullison:

Thank you for sharing with the Council on Advancement of School-Based Health Centers (the Council) your legislation, HB 0975, to create ombudsmen for school-based health centers (SBHCs).

As you know, the Council has been deeply interested in the question of central Agency staffing and resources necessary to administer the SBHC program. The Council believes that central Agency oversight and staffing for SBHCs should be expanded.

In its 2019 annual report, the Council recommended a number of critical oversight activities that may require additional Agency resources devoted to SBHCs, including:

- conducting a statewide SBHC needs assessment;
- improving collection, analysis, and sharing of SBHC quality data;
- regularly updating SBHC standards and annual survey questions;
- providing technical assistance to SBHC Administrators for establishing new SBHCs, adhering to SBHC standards, providing high-quality care in the school setting, collecting data, and performing administrative requirements;
- collecting operating income and revenue for each SBHC to understand the portfolio of funding and revenue to support sustainability;
- providing legal interpretations of privacy issues arising from FERPA and HIPAA;
- meeting information technology requirements; and
- administering grants.

The Council's recommendations are based in part on the findings of an independent consultant commissioned by the Council. The independent consultant compared Maryland's SBHC oversight structures with those of other states and made the following recommendation:

We recommend the state establish a School-Based Health Center Program Office that would be responsible for administering and overseeing all aspects of SBHCs. Eighteen states have a School-Based Health Center Program Office that is devoted entirely to the administration of SBHCs. These program Offices are typically administered by the state's Health, Medicaid, or Public Health Agency. This structure enables states to better integrate SBHCs with other state quality improvement and delivery system transformation efforts. Ideally, the Maryland office would be

jointly staffed by MSDE and MDH with staff reporting up through their respective agency's line of authority.

By way of background, the Council was charged by the Maryland General Assembly in 2015 to issue policy recommendations to promote the advancement of SBHCs in Maryland, and to offer recommendations that would help improve the health and educational outcomes of students who receive services from SBHCs. As a rule, the Council does not take positions on legislation. The Council does, however, respond to requests for information and is poised to share with policymakers its views on whether policy proposals align with the Council's recommendations. Please contact Mark Luckner at (410) 260-6290 for further information.

The opinion of the Council as staffed by CHRC expressed in this document does not necessarily reflect that of the Maryland Department of Health or the Administration.

Sincerely,



Dr. Katherine Connor
Chair, Council



Dr. Patryce Toy
Vice Chair, Council

cc: Webster Ye, Deputy Chief of Staff, Maryland Department of Health
Tiffany Clark, Director, Education Policy and Governmental Relations, Maryland State
Department of Education
Mark Luckner, Executive Director, Community Health Resources Commission
Lorianne Moss, Staff Consultant, Council on Advancement of School-Based Health Centers