



## **Testimony on SB 403**

### **Hospitals and Related Institutions - Residential Treatment Centers - Accreditation**

Senate Finance Committee

February 15, 2024

**POSITION: SUPPORT**

The Community Behavioral Health Association of Maryland (CBH) is the leading voice for community-based providers serving the mental health and addiction needs of vulnerable Marylanders. Our 89 members serve the majority of those accessing care through the public behavioral health system. CBH members provide outpatient and residential treatment for mental health and addiction-related disorders, day programs, case management, Assertive Community Treatment (ACT), employment supports, and crisis intervention.

Maryland has been grappling with ways to reduce its hospital emergency department (ED) wait times, which are among the longest in the nation. One of the factors contributing to the wait time problem is children with serious emotional disorders getting stuck in EDs due to lack of an available placement, such as a residential treatment center (RTC). SB 403 will help with that problem by allowing more choice in the accrediting bodies allowed for residential treatment centers (RTCs), thereby attracting more providers to open or expand units.

Current Maryland statute only recognizes the Joint Commission as an accrediting body for RTCs. This policy dates back to a time when hospitals were the only providers of RTCs. Since that time, two more accrediting bodies – the Commission on Accreditation of Rehabilitation Facilities (CARF) and the Commission on Accreditation (COA) have long been recognized by the federal government as appropriate to monitor RTCs (42 CFR 441.151). Maryland itself recognizes CARF and COA for the various other community behavioral health service lines as well as for Intermediate Care Facilities (ICF). Because CARF and COA focus on a rehabilitative model rather than a medical model, most behavioral health providers choose one of those organizations for their accreditation. They would then need to get a second accreditation solely for their RTC program, which would be costly in terms of both time and money.

Representatives from CARF have advised us that Maryland is the only state not to recognize CARF as an accrediting body for RTCs. The great majority of children served in RTCs end up being discharged back to the community – either to their family, a community provider, or a foster care placement. It is time for Maryland's statute to recognize RTC accrediting bodies that focus on rehabilitation.

We urge a favorable report on SB 403.