



MARYLAND GENERAL ASSEMBLY
JOINT COMMITTEE ON ADMINISTRATIVE, EXECUTIVE, AND LEGISLATIVE REVIEW

June 16, 2025

Dr. Meena Seshamani, Secretary
Maryland Department of Health
201 West Preston Street
Baltimore, Maryland 21201

Re: DLS Control No. 25-061
Maryland Department of Health:
Community-Based Behavioral Health Programs and Services:
Requirements for All Licensed Programs: COMAR 10.63.01.01 – .13
Programs Required to be Accredited in Order to be Licensed to Provide Community-
Based Behavioral Health: COMAR 10.63.02.01 – .14
Application and Licensure Process: COMAR 10.63.06.01 – .21
Corrective Actions and Sanctions: COMAR 10.63.09.01 – .10

Dear Secretary Seshamani:

The Joint Committee on Administrative, Executive, and Legislative Review (AELR) is currently reviewing the above-referenced proposed regulations, which were published in the May 16, 2025 issue of the [Maryland Register](#).

According to the Maryland Department of Health, these regulations update Chapters 1, 2, 6, and 9 under COMAR 10.63, which governs community based behavioral health programs. The regulations address licensure requirements, application procedures, program operations, and sanctions and corrective actions for violations.

For the reasons outlined below, and in accordance with the committee's authority under § 10-111 of the State Government Article, the committee hereby notifies you of its intent to conduct a more detailed study of these regulations and to ask that the department delay final adoption of the regulations. The committee expects to engage the department in a constructive review of issues relating to these regulations.

The purpose of the requested delay is to provide the committee with an opportunity to examine more closely a number of issues relating to whether the statutes under which the

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regulations were adopted authorize the adoption and whether the regulations conform to the legislative intent of the statutes. The committee wishes to ensure that concerns raised by stakeholders about the regulations are addressed. To this end, the committee encourages the department to work together with the stakeholders to resolve the issues raised by stakeholders concerning these regulations.

To facilitate its review, the committee would be grateful if the department would submit to the committee copies of any correspondence that the department received concerning the regulations during the public comment period.

The committee appreciates your cooperation in this matter.

Sincerely,



Senator Mary L. Washington
Senate Chair



Delegate Samuel I. Rosenberg
House Chair

MLW:SIR/TNB:KPK/bal

cc: President Bill Ferguson
Speaker Adrienne A. Jones
AELR Committee Members
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