The Maryland Hospital Association (MHA) is writing in response to the recently released options report on integrated behavioral health care, and to share our sincere disappointment in the process by which the report was developed.

Permitting stakeholders only 72 hours to review and comment on a report that was six months in development and addresses a complex subject that affects thousands of Marylanders is, in short, untenable. As a result, our comments are limited to the broader themes and issues raised in the report. We believe that the report homogenizes a disparate mix of Maryland behavioral health care providers, thus failing to account for their very unique differences. Specifically, there is no mention or acknowledgement of the complexities imposed by the Health Services Cost Review Commission’s (HSCRC) unique effect on Maryland’s behavioral health care delivery system.

Likewise, there is no acknowledgment of the limitations of the Primary Adult Care program and its restrictions on HSCRC-regulated sites. Further, it is unclear whether the term “community based behavioral health organizations” includes hospital-based systems of care.

We look forward to a continued and more thoughtful collaboration with you and other stakeholders to ensure that the behavioral health needs of Marylanders who rely on state-funded services are met efficiently and effectively.

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