

**Maryland Department of Health, Behavioral Health Administration
Stakeholder Engagement Session 3 – 10.63, Chapter 2**

**August 5, 2025
11:00 AM – 12:30PM**

- I. Welcome and Opening Remarks (11:00-11:05)**
- II. Meeting Procedures (11:05-11:10)**
- III. Status of COMAR 10.63 Regulatory Revisions (11:10-11:15)**
 - a. Jordan provided an overview of Phases I, II, and III of the 10.63 updates, including that the Department will not finalize Phase 2 regulations until Phase 3 is published in the Maryland Register.
 - b. The Department received more than 110 formal comments on the 10.63 proposal published in May. All formal comments must receive responses in writing prior to finalization; responses have not yet been sent.
- IV. Brief Review of Changes to 10.63.01, Chapter 1 and Stakeholder Feedback (11:15-11:25)**
 - a. Addition of bachelor's prepared rehabilitation counselor certified by the Psychiatric Rehabilitation Association**
 - i. The Psychiatric Rehabilitation Association was unintentionally omitted from the text as a recognized certification for rehabilitation specialists; it has been added into the draft text.
 - ii. Takeaways from stakeholder dialogue included:
 - 1. Though the Psychiatric Rehabilitation Association guidelines have changed and no longer require a bachelor's degree for certification, the requirements for a bachelor's degree will remain in the draft regulatory text.
 - b. Inclusion of certified registered nurse practitioner – psychiatric (CRNP-PMH) as medical directors**
 - i. Updates have been made to the draft text to allow both physician and CRNP-PMH medical directors in accordance with current state law.
 - c. Inclusion of certified associate alcohol and drug counselor (CAC-AD) approved by the Board of Professional Counselors and Therapists to supervise**

- i. Updates have been made to the draft text to include CAC-ADs in the clinical supervision language, provided that the CAC-AD is appropriately supervised in accordance with Board regulations.

V. Stakeholder Feedback on 10.63.01, Chapter 2 (11:25-12:25)

a. Requiring certain positions (e.g., medical director) to be employees

- i. This requirement is not a departure from the current regulations, which also require that certain positions be employees of an organization. Per current Maryland Department of Labor regulations, independent contractors are not considered employees.

b. Requiring minimum on-site staffing for certain positions (e.g., 20 hours per week for medical directors)

- i. This requirement is meant to ensure that, when a single individual is supervising multiple sites, all of those sites are receiving adequate oversight. Certain site-specific duties may not be performed simultaneously across sites.
- ii. Takeaways from stakeholder dialogue included:
 - 1. Certain duties of medical directors by nature involve working simultaneously across sites. The Department can take another look at this language to determine how best to support these positions.

VI. Closing Remarks and Next Steps (12:25-12:30)