



COMAR 10.63 Proposal Revisions

Association Meeting

July 17, 2025 9:00 AM - 10:00 AM GoogleMeet

Status of COMAR 10.63 Regulatory Revisions

A Phased Approach to 10.63 Updates:

- **Phase 1 – COMAR 10.63.08**
 - Civil Money Penalty
 - Finalized April 14, 2025
- **Phase 2 – Chapters 1, 2, 6, and 9**
 - Proposal published on May 16, 2025
 - Formal comment period through June 16, 2025
 - HELD by the AELR Committee pending review of issues raised in May 30 letter from Associations
 - Department ***will not finalize*** until Phase 3 is published
- **Phase 3 – Current Chapters 3, 4, and 5**
 - Program descriptions consisting of a chapter with detailed requirements for each program licensed program type.
 - Preview **and stakeholder meetings** prior to submission.
 - Target submission to AELR Late Summer 2025.

Additional Upcoming 10.63 Meetings

- Series of meetings throughout August (Two 90 minute virtual WebEx meetings per week) to discuss major themes of formal comments
- **Tentative Schedule**
 - July 30, 2025 11:00 AM - 12:30 PM – Chapter 1
 - August 1, 2025 10:00 AM - 11:30 AM – Chapter 1
 - August 5, 2025 11:00 AM - 12:30 PM – Chapter 2
 - August 8, 2025 10:00 AM - 11:30 AM – Chapter 2
 - August 12, 2025 12:30 PM - 2:00 PM – Chapter 6
 - August 15, 2025 10:00 AM - 11:30 AM – Chapter 9
 - August 19, 2024 11:00 AM - 12:30 PM – Additional Discussion
- Full agenda will be shared in advance

Responses to Formal Comment

- Department received over **110 formal comments**
- Prior to any next steps with this proposal, responses must be provided to comments in writing
- All proposals must be acted on within 1 year of proposal (e.g. by May 16, 2026)
- Department ***will not*** finalize this proposal prior to the publication of the next phase of regulations.

Topics Covered in this Meeting

- **Rehabilitation Specialists**
 - Addition of Psychiatric Rehabilitation Association (PRA) as a recognized certification.
- **Telehealth**
 - Updates to align with SB372, which was passed during the recent legislative session.
- **Certified Associate Counselor- Alcohol and Drug (CAC-AD)**
 - Updates clinical supervision language to include CAC-ADs provided the CAC-AD is appropriately supervised.
- **Commercial Kitchen**
 - Clarification of the requirements for a commercial kitchen.

Rehabilitation Specialists - 10.63.02.10

- The omission of the Psychiatric Rehabilitation Association(PRA) was an ***unintentional error***. The Department has added the recognition of PRA certification as an approved credential for a Rehabilitation Specialist back into the regulation.
- To serve as a Rehabilitation Specialist, an individual should have at least 2 years of direct care experience and meet **one** of the following:
 - Licensed mental health professional certified at the independent practice level(LCPC, LCSW-C, LCMFT, LCPAT, LCADC, PhD, PsyD, CRNP-PMH, MD, DO)
 - Licensed mental health professional receiving formal documented supervision as either an employee of the organization or under a HIPAA BAA (LGPC, LCSW, LMSW, LGMFT, LGPAT, LGADC, Psyc. Associate)
 - Licensed Occupational Therapist
 - Registered nurse with either a psychiatric mental health certification or a bachelor's degree(RN-C, APRN-PMH)
 - Master's prepared rehabilitation counselor certified by the Commission on Rehabilitation Counselor Certification(CRC)
 - Bachelor's prepared rehabilitation counselor certified by the Psychiatric Rehabilitation Association(CPRP, CFRP)

Telehealth – 10.63.01.09

- Updates language in accordance with SB372 – Preserve Telehealth Access Act of 2025
- Removes blanket prohibition on audio-only telehealth.
- Clarifies that covered services shall be held with the program participant, for family sessions, or other services which are held without the participant but with the participant's family or guardian that are permissible in person meeting.

Substance Use Disorder Clinical Supervisors — 10.63.02.14

- Includes Certified Associate Counselors- Alcohol and Drug (CAC-AD) as possible SUD clinical supervisors.
- Clarifies that CAC-ADs ***must*** have appropriate clinical supervision as required by the Board of Professional Counselors and Therapists' regulations found in COMAR 10.58.07.07.

Commercial Kitchens — 10.63.01.07

- Adds definition of “Dietary Services”
 - Dietary services is ***comprehensive food preparation*** as a service provided to participants.
 - Dietary services ***is not***:
 - Communal food preparation by participants
 - Food preparation done as a rehabilitative activity
- Allows for meals to be provided by the program directly or through the utilization of a food management company, caterer, or another facility.
- Requires a written plan for program providing dietary services.