



## DEPARTMENT OF HEALTH

Wes Moore, Governor · Aruna Miller, Lt. Governor · Meena Seshamani, M.D., Ph.D., Secretary

### Board of Podiatric Medical Examiners

4201 Patterson Avenue

Baltimore, MD 21215

February 10, 2026

The Honorable Pamela Beidle  
Chair, Finance Committee  
3 East Senate Miller Office Building  
11 Bladen Street  
Annapolis, MD 21401-1991

### **RE: SB 333 – Interstate Podiatric Medical Licensure Compact – Letter of Concern**

Dear Chair Beidle and Committee Members:

The Board of Podiatric Medical Examiners (the “Board”) respectfully submits this Letter of Concern addressing SB 333. This Bill creates a Commission which would establish fees and oversight in a format mimicking a “Superboard”. The proposed structure will affect the autonomy of the Board and would subject a member Board to state laws being superseded by those of the rules and bylaws that have yet to be written by the Commission. The cost to each state member Board and licensees is unknown, however, it is likely that the start-up and maintenance of administrative expenses of the Commission would be significant for participants.

With so many unwritten, vague and to-be-defined rules, bylaws and processes, it is difficult to accept that this process modernizes and streamlines the licensing process, which is different in many important respects to Maryland's licensure and disciplinary processes, especially that it would require a parallel IT Platform and software system for licensure. Further, if Maryland law is in conflict with the Compact law, the Maryland disciplinary laws would be superseded concerning Compact licensees, an outcome that would be incompatible with the goal of creating a portable license when the eligibility requirements are inconsistent with Maryland. The Board has concerns that were this Bill to pass, it would seriously delay many processes and increase overall expenses. The Board is presently in a fiscal deficit status. Most importantly, the Board cannot be assured of an increase in new additional licensees, in addition to the 20-28, per year, which has been a consistent number for 35 years.

Another concerning issue is that there is no history of an increase in job availability, therefore, the fiscal situation would become even more arduous to support. The Board, according to this legislation, would be obligated to build and eventually fiscally support the Commission, without being able to extricate themselves. The oversight of the Commission

would be a duplicative function over a Board that is autonomous and functions as a Special Funded Board solely supported by licensees' licensing fees and the license renewal fees.

### **I. Licensure under proposed COMPACT Laws**

- A. A major concern is that licensure through the Compact would make it possible for an applicant who does not qualify for licensure in Maryland to obtain a Maryland license if the applicant meets Compact qualifications. As an example, if the Board becomes a member board and is not the designated state of principal license by the podiatrist, the Board will be required to issue a Maryland license to the applicant based on meeting Compact qualifications. Maryland does not retain the autonomy or discretion to consider good moral character, practice history, education qualifications, criminal record checks with rap back alerts, or additional requirements that currently exist in Maryland licensure regulations.
- B. The Interstate Commission will hold authority to develop the rules regarding the fees for an expedited license (6B). Therefore, the Board still questions the profitability and lack of total authority concerning disciplinary actions, versus expense of joining the Compact.

### **II. Renewal of the Expedited License**

- C. A license must be renewed through the Commission - not the state of principal license. Therefore, the Commission would function as a middleman and an additional gatekeeper in the renewal process. A licensee must have a full and unrestricted license in that state, cannot have been convicted or have had a deferred disposition (e.g. Probation before judgment) for certain crimes, and cannot have had licensure discipline or have had a DEA or CDS registration certificate suspended or revoked in order to renew.
- D. It is unclear what information would be requested on the renewal application, whether there would be similar character and fitness (attestation) questions as on the Maryland renewal application, or what would be required for "YES" answers to these questions.
- E. The Interstate Commission again holds the authority to develop rules addressing renewals (Section 7f).

### **III. Administration, Board Representation and Finances Concerns**

- F. The Compact requires four (4) states to be legislated as Compact states, thus be governed by the Interstate Podiatric Medical Licensure Compact Commission, which would be comprised of one (1) representative from each member Board. Therefore, it is of major concern to the Board of Podiatry that four (4) members can develop and rule over all the decisions with so many unwritten, vague and to-be-defined rules, bylaws and processes that are binding on all member states as stated in SB 333.
- G. The Commission can promulgate rules, adopt bylaws, issue advisory opinions, maintain offices, hire employees, rent or purchase property and collect an annual assessment fee from each state, however, no funding source or amount is set forth in the proposal.
- H. Although the Commission can issue opinions interpreting the Compact, they are not binding on courts, so courts in different states could issue conflicting opinions or orders.
- I. There is no definitive statement outlining the provision of legal advice to the Commission, or whether the Office of the Attorney General in each state is involved. Although Section

14 (D)(3) addresses defense somewhat regarding lawsuits and liability, it is unclear.

#### **IV. Information Disclosure, Investigations and Discipline**

- J. Unlike Health Occ. Section 14-411(j), which allows Maryland to disclose complaints and investigative information to other state boards only if certain conditions are met, the Compact requires such sharing of this information with other member states and the Commission.
- K. The bill provides for a "coordinated information system", including a database of all podiatrists licensed through the Compact. The Commission will develop rules for mandated and discretionary sharing of information without an explanation of how this would work. Cost is likely to be incurred in the development and maintenance of such a system.
- L. The Compact permits joint investigations by member states and allows a member state to investigate in another member state. A subpoena issued in one member state is enforceable in any other.

For all of the reasons stated above, the Podiatry Board requests an unfavorable report on SB 333. If you would like to discuss this further, please do not hesitate to contact me at [Eva.Schwartz@maryland.gov](mailto:Eva.Schwartz@maryland.gov) or 410-764-4784; or Lillian Reese, Legislative Liaison, at [lillian.reese@maryland.gov](mailto:lillian.reese@maryland.gov), or (443) 794-4757.

Sincerely,



Eva Schwartz MS, MT, SBB (ASCP)  
Executive Director  
Board of Podiatric Medical Examiners

*The opinion of the Board expressed in this letter of concern does not necessarily reflect that of the Department of Health or the Administration.*