



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 18, 2026

The Honorable Heather Bagnall
Chair, Health Committee
240 Taylor Office Building
Annapolis, MD 21401-1991

RE: HB 619 – Interstate Podiatric Medical Licensure Compact – Letter of Concern

Dear Chair Bagnall and Committee Members:

The Board of Podiatric Medical Examiners (the “Board”) respectfully submits this Letter of Concern addressing HB 619. This Bill creates a Commission which would establish fees and oversight in a format that may impact the operations of the Board when licensing out of state licensed Compact applicants for a Maryland license. The Board, as a Special Funded Board, was legislated into law by this Committee in 1991. The proposed structure would subject a member Board to the rules and by-laws that have yet to be written by the Commission, a Commission yet to be established. 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.

At the Senate Finance hearing for the cross-filed Bill, SB 333, it was stated that a Federal Grant will pay for those fees requested by the Commission from the applicants licensed in another state, who would be applying for a Maryland license. That statement concerns the Board since such fiscal commitments do not appear in this Bill, thus the entire operation is faith based that it would come to fruition, being built on an existing platform, the “Interstate Medical Licensing Compact”, that allegedly works perfectly well for the Board of Physicians (BOP), as stated by Senator Kramer. In consultation with the Board of Physicians, to ascertain these assurances, and to quiet the Board’s concerns, the Board of Podiatry was directed to a public Report available in the Legislative Library. The BOP’s Report identifies many issues with their COMPACT, which is identical to the proposed Interstate Podiatric Medical Licensing Compact that is being proposed in this Bill.

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, especially that it would require a parallel IT Platform and software system for licensure. 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 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 HB 619.
- G. The Commission can promulgate rules, adopt bylaws, issue advisory opinions, maintain

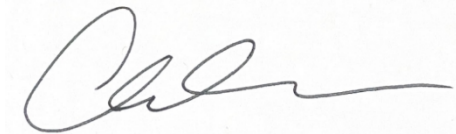
- offices, hire employees, rent or purchase property and collect an annual assessment fee from each state, however, no funding source or amount is set forth in the proposal.
- H. Although the Commission can issue opinions interpreting the Compact, they are not binding on courts, so courts in different 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 HB 619. If you would like to discuss this further, please do not hesitate to contact the Board's Executive Director, Eva Schwartz, at Eva.Schwartz@maryland.gov or 410-764-4784; or Lillian Reese, Legislative Liaison, at lillian.reese@maryland.gov, or (443) 794-4757.

Sincerely,



Adam Silverman, DPM
Board President
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.