



DEPARTMENT OF HEALTH

Wes Moore, Governor · Aruna Miller, Lt. Governor · Meena Seshamani, M.D., Ph.D., Secretary
February 26, 2026

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

RE: HB 931 – Health Care Facilities - Nursing Homes - Medical Director Requirements – Letter of Concern

Dear Chair Bagnall and Committee members:

The Maryland Department of Health (the Department) respectfully submits this letter of concern for House Bill (HB) 931 - Health Care Facilities - Nursing Homes - Medical Director Requirements.

The Office of Health Care Quality (OHCQ) is the designated State survey agency in Maryland authorized to conduct certification activities on behalf of the Centers for Medicare & Medicaid Services (CMS). Through State and federal authority, OHCQ conducts surveys to determine compliance with State licensure and/or federal certification regulations, which establish the minimum requirements for health care providers to remain licensed and/or certified.

HB 931 requires a physician, in order to be designated as a medical director of a nursing home, to hold a certain medical director certification, prohibits a physician from being a designated medical director at more than two licensed nursing homes, and requires MDH to establish and maintain an online directory of nursing home medical directors.

COMAR 10.07.02.15 already requires each nursing home medical director to complete a curriculum in physician management or administration from The Society for Post-Acute and Long-Term Care Medicine or another approved entity. Nursing homes are responsible for verifying this upon hiring a medical director, and OHCQ already monitors and enforces facilities' compliance with this regulation through its existing survey process.

HB 931 would shift the responsibility for verifying individual physicians' professional credentials and certifications from nursing homes to OHCQ, requiring additional resources at a cost of \$98,296 in FY28. Furthermore, OHCQ is an agency tasked with managing the licensure and certification of healthcare facilities and programs – as such, maintaining directories of individual clinicians does not fall within OHCQ's purview. If you would like to discuss this further, please do not hesitate to contact Meghan Lynch, Director of Governmental Affairs at Meghan.Lynch@maryland.gov.

Sincerely,

Meena Seshamani, M.D., Ph.D
Secretary of Health