

3a - EHEA - SB 952 - Bd. Physicians - LoO.pdf

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Position: UNF



Board of Physicians

Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Damean W.E. Freas, D.O., Chair

2021 SESSION POSITION PAPER

BILL NO.: SB 952 – Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat
COMMITTEE: Education, Health, and Environmental Affairs
POSITION: Letter of Opposition

TITLE: Health Occupations – Internship and Residency Training Requirements – Waiver for Former Services Members Injured in Combat

BILL ANALYSIS: Requires health occupations boards to waive internship or residency training requirements for licensure, certification, or registration for a former service member who is disabled as a result of combat deployment.

POSITION & RATIONALE:

The Maryland Board of Physicians (the “Board”) is respectfully submitting this letter of opposition for Senate Bill (SB) 952 – Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat. SB 952 would require the Board to waive residency and internship requirements for service members who were disabled as a result of an injury from combat deployment. While the Board supports efforts to ease the licensure process for service members, internship and residency is an essential component of licensure and cannot be waived without jeopardizing patient safety.

Medical school provides a foundation and framework for the practice of medicine. However, it is the internship and residency training where physicians and other healthcare practitioners fully learn to perform the responsibilities and duties of their profession without supervision. According to a 2006 report by the Federation of State Medical Boards, the uniform requirement that physicians must successfully complete a minimum number of years in residency training in an approved program “further assures state medical boards and the public of the competence of newly licensed physicians.”¹ Removing internship and residency requirements would remove an essential safeguard to the health and wellbeing of Maryland’s citizens.

¹ *Report of the Special Committee on the Evaluation of Undergraduate Medical Education.* Federation of State Medical Boards, 2006, www.fsmb.org/siteassets/advocacy/policies/evaluation-of-undergraduate-medical-education.pdf. Accessed 17 March 2021.

The Board is not aware of any instances where licensure was denied because a service member was unable to fulfill the residency or internship components of their education due to a disability as a result of injury from combat deployment. The Board is concerned that removing or waiving these requirements would reduce the quality of care and professionalism among physicians and allied health practitioners in Maryland.

In addition to concerns about the removal of key training components for physicians and allied health practitioners, two other elements of the bill need clarification. First, the term “disabled” is not defined in the bill. How would the Board verify whether applicants had been “disabled as a result of injury from combat deployment”? While the U.S. Department of Veterans Affairs can provide documentation regarding an applicant’s disability rating, this information does not currently include whether the disability is the result of an injury from combat deployment. Without further clarification, the Board would be unable to effectively enforce this requirement.

Second, as written, SB 952 only waives internship and residency requirements. Many health occupations have clinical training requirements that are not considered internships or residency programs. It is unclear whether SB 952 intends to waive all clinical training requirements for health occupations, or only the requirements for those occupations that specifically require an internship or residency period.

The Board supports efforts to ensure that the licensure process is fair and accessible for all who meet requirements, and would be happy to work with bill sponsors and advocates on finding a non-legislative solution to any access barriers. However, in its current state, the Board must respectfully oppose SB 952.

For more information, please contact Wynnee Hawk, Manager, Policy and Legislation, Maryland Board of Physicians, 410-764-3786.

The opinion of the Board expressed in this document does not necessarily reflect that of the Maryland Department of Health or the Administration.

3b - EHEA - SB 952 - Dental Board - LOO.pdf

Uploaded by: Bennardi, Maryland Department of Health /Office of Governmen

Position: UNF



Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Dennis R. Schrader, Acting Secretary

Maryland State Board of Dental Examiners
Spring Grove Hospital Center
Benjamin Rush Building
55 Wade Avenue/Tulip Drive
Catonsville, Maryland 21228

2021 SESSION
POSITION PAPER

BILL NO: SB 952

COMMITTEE: Education, Health, and Environmental Affairs

POSITION: Oppose

TITLE: Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat

BILL ANALYSIS: Senate Bill 952 requires each health occupations Board, including the Dental Board, to waive any internship or residency training requirements for licensure, certification, or registration, for a former service member who is disabled as a result of injury from combat deployment, if the applicant was discharged under circumstances other than dishonorable, and successfully completed the education and examination requirements for licensure.

POSITION AND RATIONALE: The Dental Board opposes SB 952. The Dental Board treats each application filed by a veteran as a priority. Although the Board assigns an advisor to each veteran who applies for licensure, and expedites their application, the Board believes that the bill will place Maryland citizens in jeopardy. First, the bill does not define the word “disabled” and does not identify who, or what agency determines the existence or degree of disability. For example, the Department of Veterans Affairs assigns disability as a percentage. That percentage may range from 1% to 100%. A disability of 1% is the rating for a very minor impairment while an individual with a 100% disability suffers total disability. Generally, a medical examination is completed in order to evaluate and assess the severity of any disability. Rating schedules are typically organized under a variety of physical body systems and includes mental disorders.

Under the bill any individual, assuming that an examination was conducted by a licensed health care provider, may assign any degree of disability. That raises obvious concerns since a disability rating of 1% would result in the waiver of any internship or residency requirements which may be a prerequisite for licensure.

Most importantly, the bill would result in inadequately trained dental specialists. For example, all dentists who choose to enter a specialty, such as oral and maxillofacial surgery, pedodontics,

public health, endodontics, etc., must complete a specialty program ranging from 2 to 4 years, depending upon the specialty. All specialty programs include residency and internship work. Those programs are fully integrated into the education and examination requirements and cannot be separated from those requirements as the bill attempts to do. For example, residents are regularly examined by their mentors while actually treating patients. Examinations while performing clinical work comprises the bulk of a specialty candidate's examinations. Dentists who enter specialty programs have since graduated from dental school, and although they undergo additional classroom training, the majority of their work entails treating patients in clinics and public health programs as part of their internship and residency requirements. The internship and residency training are essential, and its elimination would place patients in jeopardy.

Equally troubling is the fact that a disability includes mental disorders, including posttraumatic stress disorder. If an individual suffers from an emotional disorder that would hamper their ability to treat patients, or potentially place patients at risk of physical harm, the Board would be powerless to deny the license or specialty recognition.

Finally, the bill could be interpreted as eliminating internship training for dental students in an undergraduate program. There are dental schools throughout the country that require students to "intern" in a clinic or public health arena before graduating. Eliminating the hand-on internship requirement would substantially interfere with the undergraduate program.

For these reasons, the Dental Board urges the Committee to issue an unfavorable report for SB 952.

I hope that this information is helpful. If you would like to discuss this further, please contact me at 301-367-2352, jgoldsm217@comcast.net, or Dr. Arpana Verma, the Board's Legislative Committee Chair at 240-498-8159, asverma93@gmail.com. In addition, the Board's Executive Director, Mr. Frank McLaughlin may be reached at 443-878-5253, frank.mclaughlin@maryland.gov.

The opinion of the Maryland State Board of Dental Examiners expressed in this oppose position paper does not necessarily reflect that of the Department of Health or the Administration.

3d - SB 952-Board of Podiatry-LOO.pdf

Uploaded by: Bennardi, Maryland Department of Health /Office of Governmen

Position: UNF



Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Dennis R. Schrader, Acting Secretary

Board of Podiatric Medical Examiners

Yvonne Umezurike, DPM, President

Eva Schwartz, Executive Director

4201 Patterson Ave, Room 310

Baltimore, MD 21215

**2021 SESSION
POSITION PAPER**

BILL NO.: SB 952 – Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat
COMMITTEE: Education, Health, and Environmental Affairs
POSITION: Letter of Opposition

TITLE: Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat

BILL ANALYSIS: Requires health occupations boards to waive internship or residency training requirements for licensure, certification, or registration for a former service member who is disabled as a result of combat deployment.

POSITION & RATIONALE:

The Maryland Board of Podiatric Medical Examiners (the “Board”) is respectfully submitting this letter of opposition for Senate Bill 952 – Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat. SB 952 would require the Board to waive residency requirements for service members who were disabled as a result of an injury from combat deployment. While the Board supports efforts to ease the licensure process for service members, residency is an essential component of licensure and cannot be waived without jeopardizing patient safety.

The School of Podiatric Medicine provides a foundation and framework for the practice of podiatric medicine and surgery. However, it is the residency training where podiatrists are rotating through medical and surgical specialties, typically in a hospital or ambulatory surgical facility, to fully train and learn to perform the responsibilities and duties of their profession. The Council of Podiatric Medical Education requires a three year post graduate advanced podiatric

medicine and surgery education, which is achieved through an approved Podiatric Residency Program. The training in an approved residency program “further assures state podiatric medicine and surgery boards and the public of the competence of newly licensed doctors of podiatric medicine (DPM)”. Waiving residency requirements would remove an essential safeguard to the health and wellbeing of the citizens of Maryland. The Board is concerned that by removing or waiving the residency requirements, it would be mandated to issue the same license to a podiatrist that met all the training requirements during residency for obtaining experience and equivalency in practicing standards of care, as well as issue the same license to a podiatrist that has not achieved the training, clinical education, experience and expertise, because they lacked the residency training.

The Board is not aware of any instances where licensure was denied because a service member was unable to fulfill the residency components of their education due to a disability as a result of injury from combat deployment. The Health Occupation Boards can follow the Americans with Disabilities Act of 1990, and according to federal guidance, make reasonable accommodations for former service members injured in combat.

The Board supports efforts to ensure that the licensure process is fair and accessible for all who meet requirements, and would be happy to work with bill sponsors and advocates on finding a non-legislative solution to any access barriers. However, in its current state, the Board must respectfully oppose SB 952.

For more information, please contact Eva Schwartz, Executive Director, Maryland Board of Podiatric Medical Examiners at eva.schwartz@maryland.gov.

The opinion of the Board expressed in this document does not necessarily reflect that of the Maryland Department of Health or the Administration.

3e - SB 952- Board of Aud-HAD-SLP - LOO.pdf

Uploaded by: Bennardi, Maryland Department of Health /Office of Governmen

Position: UNF



Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Dennis R. Schrader, Acting Secretary

**Board of Examiners For Audiologists, Hearing
Aid Dispensers & Speech-Language
Pathologists**
4201 Patterson Avenue
Baltimore, MD 21215
Phone: 410-764-4723

2021 SESSION POSITION PAPER

BILL NO: SB 952 -
COMMITTEE: Education, Health and Environmental Affairs
POSITION: Oppose

TITLE: Health Occupations – Internship and Residency Training Requirements – Waiver
for Former Service Members Injured in Combat

BILL ANALYSIS: This bill requires health occupation boards to waive any internship, residency training requirements for licensure, certification, or registration for a former service member who is disabled due to injury from combat deployment.

POSITION AND RATIONALE: After a thorough review of SB 952, the Board of Examiners Audiologists, Hearing Aid Dispensers and Speech-Language Pathologists (the “Board”) has respectfully taken a position of opposition. SB 952, as written, may require the Board to waive the supervised clinical training for licensure of Audiologists, Hearing Aid Dispensers and Speech-Language Pathologists who are disabled combat veterans. Supervised clinical training is an essential component for licensure. Licensees complete a clinical fellowship, which includes both direct and indirect client contact supervision under a licensed Audiologist, Hearing Aid Dispenser or Speech-Language Pathologist. During training, licensees are allowed the opportunity to service clients, while gaining much needed guidance by an experienced licensee in the clinical field and, therefore, these requirements cannot be waived. Additionally, the Board is concerned that waiving the required training would be a major disadvantage for disabled combat veterans and could also jeopardize the safety of Maryland consumers.

The Board is in full support of offering additional assistance through the licensure process for service members injured in combat and their spouses, but respectfully opposes SB 952 as written.

For more information, please contact Oluremi Dean, MHA, Acting Executive Director, 410-764-4724 or at oluremi.dean@maryland.gov.

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

NPAM Letter to Oppose SB952.pdf

Uploaded by: Lang, Beverly

Position: UNF



"Advocating for NPs since 1992"

March 18, 2021

Re: SB 952 – Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat - OPPOSED

On behalf of the Nurse Practitioner Association of Maryland, Inc., (NPAM) the only professional association advocating solely for the over 7,100 certified Nurse Practitioners (NPs) licensed in Maryland, and the over 800 active members of NPAM, we respectfully request you **OPPOSE SB 952 - Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat.**

This bill requires health occupations boards to waive internship or residency training requirements for licensure, certification, or registration for a former service member who is disabled as a result of combat deployment.

While we support efforts to ease the licensure process for service members, we believe that the internship and residency programs for physicians is an essential component of licensure and cannot be waived and may jeopardize the health and wellbeing of Maryland's citizens.

It is concerning that the bill does not define the term "disabled" and it is unclear how any health occupations board would verify whether an applicant had been "disabled as a result of injury from combat deployment". Additionally, as written, SB 952 only waives internship and residency requirements. Many health occupations, such as nursing, have clinical training requirements that are not considered internships or residency programs. It is unclear whether SB 952 intends to waive all clinical training requirements for health occupations, or only the requirements for those occupations that specifically require an internship or residency period.

NPAM is hopeful you will **OPPOSE SB 952 Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat.** Feel free to contact Beverly Lang, Executive Director, NPAM if you require additional information.

Kindest Regards,
Beverly Lang MScN, RN, ANP-BC, FAANP
Executive Director,
Nurse Practitioner Association of Maryland Inc.
443-367-0277 (Office)
Fax: 410-772-7915
NPAMexdir@npedu.com

The Nurse Practitioner Association of Maryland, Inc.
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MPMA letter Oppose SB952 .pdf

Uploaded by: Peters, Sarah

Position: UNF



MARYLAND PODIATRIC MEDICAL ASSOCIATION

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Telephone: (410) 332-0736

Facsimile: (410) 332-0885

March 18, 2021

Bill: SB 952 – Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat

Position: **OPPOSED**

Dear Chair Pinsky, Vice-Chair Kagan, and Members of the EHEA Committee:

On behalf of the Maryland Podiatric Medical Association (MPMA) representing approximately 260 podiatrists licensed in Maryland, we respectfully request that you **OPPOSE SB 952**.

This bill requires health occupations boards to waive internship or residency training requirements for licensure, certification, or registration for a former service member who is disabled as a result of combat deployment.

Internship and residency training is where health professionals learn to perform the responsibilities and duties of their profession in a hospital/clinical setting. MPMA believes that internship and residency programs are an essential component of practicing and without it, could put the health and wellbeing of patients at risk.

MPMA encourages the General Assembly and the Health Occupation Boards to work together to identify the barriers for former service members injured in combat without waiving internship and residency requirements.

For these reasons, MPMA again respectfully requests that you **OPPOSE SB 952**. Should you have any questions, please feel free to contact MPMA Executive Director Richard Bloch at richard@sbhpa.com.

Sincerely,

Dr. Justin J. Lewis, DPM, MS, FACFAS
President, MPMA

3c - EHEA - SB0952 - BON - LOIWA.pdf

Uploaded by: Office of Governmental Affairs, Maryland Department of Health

Position: INFO



Board of Nursing

Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Dennis R. Schrader, Acting Secretary

March 23, 2021

The Honorable Paul G. Pinsky
Chair, Education, Health, and Environmental Affairs Committee
2 West, Miller Office Building
Annapolis, MD 21401-1991

RE: SB 952 – Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat – Letter of Information with Amendments

Dear Chair Pinsky and Committee Members:

The Maryland Board of Nursing (“the Board”) respectfully submits this letter of information with amendments for Senate Bill (SB) 952 – Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat. This bill requires certain health occupations boards to waive certain internship or residency training requirements for licensure, certification, or registration for a certain former service member who has successfully completed certain education requirements and passed a certain examination. Additionally, this bill alters the information that certain health occupations boards are required to publish on their website.

Advanced Practice Registered Nurses (APRNs) are health care providers afforded the ability to practice independently and to the full scope of his/her practice. APRNs within the state of Maryland can own their own clinical practice, prescribe controlled substances, and precept nursing students. Due to their extensive scope of practice and responsibilities, it is critical to ensure that all APRNs are evaluated for competency and meet all education and training requirements to practice independently. The Board believes SB 952 will affect the mentorship requirements APRNs must complete in order to obtain certification to practice.

Title §8-302.1 of the Health Occupations Article requires an applicant for initial certification as an APRN to identify a mentor who will consult and collaborate with the applicant for 18 months. Additionally, the Code of Maryland Regulations (COMAR) requires an APRN graduate to provide to the Board a name of an APRN who will directly supervise the graduate. The mentorship enables the supervising APRN to observe the graduate’s decision making process, confidence in navigating a stressful environment, and adaptability to critical changes.

The Board also believes that if enacted, SB 952 may complicate Maryland’s ability to join the APRN Licensure Compact (LC). The APRN LC works to reduce duplicative licensure for

§ 8-302.1. Advanced Practice Certification.

[https://govt.westlaw.com/mdc/Document/N7B277CF0853011E8BDB393B3CCCAE216?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/mdc/Document/N7B277CF0853011E8BDB393B3CCCAE216?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))

COMAR Subtitle 27 – Board of Nursing. http://www.dsd.state.md.us/COMAR/subtitle_chapters/10_Chapters.aspx#Subtitle27

APRNs practicing in multiple states and aims to improve and expand access to health care for individuals in underserved communities. The LC rules require an APRN to follow strict education and training requirements to be eligible for multistate licensure privilege. For example, an applicant must have practiced as an APRN for at least 2,080 hours independent from training in school.

The Board would like to propose an amendment for SB 952. The amendment would ensure that individuals applying for the internship and residency training requirement waiver would be evaluated for competency before clinical practice.

For the reasons discussed above, the Board of Nursing respectfully submits this letter of information with amendments for SB 952.

I hope this information is useful. For more information, please contact Iman Farid, Health Policy Analyst, at (410) 585 – 1536 (iman.farid@maryland.gov) or Rhonda Scott, Deputy Director, at (410) 585 – 1953 (rhonda.scott2@maryland.gov).

Sincerely,



Gary N. Hicks
Board President

The Board respectfully submits the following amendment:

Amendment 1. On pg. 2, line 21 after “REGISTRATION”

;~~AND~~ INCLUDING AN APPROPRIATE COMPETENCY ASSESSMENT.

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