



# Board of Physicians

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

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## 2022 SESSION POSITION PAPER

**BILL NO.:** SB 230 – Health Occupations – Service Members, Veterans, and Military Spouses – Temporary Licensure, Certification, Registration, and Permitting  
**COMMITTEE:** Health and Government Operations  
**POSITION:** Letter of Opposition

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**TITLE:** Health Occupations – Service Members, Veterans, and Military Spouses – Temporary Licensure, Certification, Registration, and Permitting

**BILL ANALYSIS:** Senate Bill (SB) 230 requires certain health occupations boards, including the Maryland Board of Physicians (the Board), to issue an expedited temporary license to service members, veterans, or military spouses who meet certain requirements.

**POSITION AND RATIONALE:**

It is the Board’s position that no changes are needed to Title 1, Subtitle 7 of the Health Occupations Article to expedite the processing of licensure applications submitted to the Board by service members, veterans, and military spouses. Pursuant to legislation passed in 2013, the Board has developed procedures to expedite all licenses for service members and spouses, and the process is working well to expedite such licensure. For example, 99% of all licenses are issued within 10 days of the Board receiving the last qualifying document.

In addition, the Board already offers several pathways for expedited physician licensure through reciprocity or through the Interstate Medical Licensure Compact. The Board also implemented an online application for physicians and the Uniform Application, and the Board accepts credentials through the Federation Credentialing Verification Service.

The Board currently is working on other expedited methods, including license reciprocity with the District of Columbia and Virginia, licensure by endorsement, and online applications for all practitioners. For a physician with a valid license in another state, licensure by endorsement will require a brief application and a criminal history records check be completed by the applicant, and the Board will verify credentials. Furthermore, the Board, in November 2021, approved the drafting of regulations to further ease the licensure process for service members and spouses. For example, these future regulatory changes could include, but not be limited to, certain fee reductions and deferments of continuing education requirements for individuals on deployment.

The Board does not issue temporary licenses for any practitioner regulated by the Board. Issuing a temporary license, and then a full license, will slow down the process rather than expedite it. The expedited temporary license described in the bill essentially creates a new licensure category that will require two new Board positions (one licensure analyst for physicians and one for allied health practitioners), an overhaul of the Board's licensure system and Web-based practitioner profile system, and development of a new application for an expedited temporary license. The Board also will need to promulgate regulations.

While SB 230 includes provisions that alternatives to temporary licensure could be considered upon application to the Secretary, the Board has no guarantee that such a process is approved or that, once granted, such an approval would not be subject to change. The Board is concerned that granting or altering such an exception will cause the Board to significantly revise its licensure process without due notice. As the language on page 6, lines 14 through 17 of the bill requires that all applicants who meet the requirements for licensure be granted a license within 15 days of submission of a completed application, the Board does not believe that requiring the Secretary to approve alternative licensure processes is necessary.

Finally, the Board wishes to note that the bill, as amended, adds a provision regarding an applicant's license issued in another state. It appears this will require Board staff to research licensure qualifications of other states to determine if those requirements are "substantially similar" to those of Maryland. *See page 4, lines 10-14.* For Board staff, such research will add steps to the process, which will have the adverse effect of extending the licensure timeline.

For these reasons, the Board respectfully requests that the committee vote unfavorably on this bill. For additional information, contact Matthew Dudzic, Manager of Policy and Legislation, Maryland Board of Physicians, at 410-764-5042.

Sincerely,



Damean W. E. Freas, D.O.  
Chair, Maryland Board of Physicians

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