



DEPARTMENT OF HEALTH

Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Secretary

February 11, 2025

The Honorable Pamela Beidle
Chair, Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, Maryland 21401

RE: Senate Bill (SB) 458 - Health Occupations – Structural Racism Training - Letter of Support with Amendments

Dear Chair Beidle and Committee Members:

The Maryland Department of Health (Department) respectfully submits this letter of support with amendments to Senate Bill (SB) 458. This bill requires applicants for health occupation license or certification renewal to complete a structural racism training course in addition to an implicit bias training course currently required as part of the Cultural and Linguistic Health Care Professional Competency Program (program).

Under current law, the program identifies and approves evidence-based implicit bias training courses that health care professionals must complete to renew a license or certificate issued by a health occupations board. Additionally, the program may only approve courses that are recognized by a health occupations board or accredited by the Accreditation Council for Continuing Medical Education (ACCME).

The Department supports the goals of SB 458 to advance health professionals' understanding of structural racism, but suggest an amendment to assist with implementation. The definition of structural racism outlined in the bill refers to “a system of inherited institutional settings that provide differential opportunities.” To ensure a definition is easily understandable and accessible, the Department suggests replacing the definition with one developed by the American Medical Association. Additionally, with respect to the identification of evidence-based courses, the ACCME does not currently offer any courses on structural racism on its website, definition notwithstanding.¹ This lack of available evidence-based resources could create additional challenges for MHHD as the office looks to identify appropriate, accredited structural racism training courses to post online.

Finally, consistent with the legislation's current recommendation that licensing boards identify implicit bias training opportunities specific to their disciplines, should this additional training requirement be implemented, MHHD believes that each licensing board is best suited to identify both implicit bias and structural racism training courses relevant to and most appropriate for their

¹ “Accreditation Council for Continuing Medical Education” ACCME Implicit Bias Training
<https://www.cmepassport.org/activity/search?specialty=implicit%20bias>

licensees. While MHHD will continue to identify evidence-based courses on implicit bias, and can identify evidence-based courses on structural racism in the health care context when such courses become available, it is recommended that licensing boards continue to suggest implicit bias and, potentially, structural racism courses that are most pertinent to their specific areas of practice.^{2 3}

If you would like to discuss this further, please do not hesitate to contact Sarah Case-Herron, Director of Governmental Affairs, at sarah.case-herron@maryland.gov.

Sincerely,



Laura Herrera Scott, MD, MPH
Secretary

²Jones, K.A. (2000, August). Levels of Racism: A Theoretic Framework and a Gardener's Tale. *American Journal of Public Health*, 90 (8), 1212-1215. <https://pmc.ncbi.nlm.nih.gov/articles/instance/1446334/pdf/10936998.pdf>

³Dent RB, Vichare A, Casimir J. Addressing Structural Racism in the Health Workforce. *Med Care*. 2021 Oct 1;59(Suppl 5):S409-S412. doi: 10.1097/MLR.0000000000001604. PMID: 34524236; PMCID: PMC8428853. <https://pmc.ncbi.nlm.nih.gov/articles/PMC8428853/>

In the Senate Finance Committee:

AMENDMENTS TO SENATE BILL 458

(First Reading File Bill)

On page 2, lines 20-23, strike “STRUCTURAL RACISM MEANS A SYSTEM OF INHERITED INSTITUTIONAL SETTINGS THAT PROVIDE DIFFERENTIAL OPPORTUNITIES FOR HEALTH CARE, EDUCATION, HOUSING, EMPLOYMENT, AND THE ENVIRONMENT TO AN INDIVIDUAL BASED ON THE INDIVIDUALS RACE.” and insert “STRUCTURAL RACISM REFERS TO THE TOTALITY OF WAYS IN WHICH SOCIETIES FOSTER RACIAL DISCRIMINATION THROUGH MUTUALLY REINFORCING SYSTEMS OF HOUSING, EDUCATION, EMPLOYMENT, EARNINGS, BENEFITS, CREDIT, MEDIA, HEALTH CARE, AND CRIMINAL JUSTICE.”