



February 6, 2026

Senator Pamela Beidle, Chair
Finance Committee
Maryland Senate
Room 3
Miller Senate Building
Annapolis, MD 21401

Delegate Heather A. Bagnall, Chair
Health Committee
Maryland House of Delegates
Room 240
Taylor House Office Building
Annapolis, MD 21401

Re: MD Senate Bill 380 and House Bill 598,
Physicians - Licensing - Internationally Trained Physicians

Dear Chairs Beidle and Bagnall,

On behalf of the Federation of State Medical Boards (FSMB), thank you for the opportunity to comment on Senate Bill 380 and House Bill 598, which are pending before your committee.

Policymakers across the country are exploring ways to improve patient access and address projected physician workforce shortages by easing licensure requirements for internationally trained physicians (ITPs) and creating additional licensure pathways. These proposals often bypass traditional requirements, including U.S. accredited postgraduate training (graduate medical education), which ensures that applicants for licensure have attained an adequate level of knowledge, skills and competencies to provide quality care to their patients.

To date, 18 states have enacted legislation creating additional licensure pathways for this cohort of physicians. While there are many commonalities among them, key differences can create confusion among physicians, regulators, and patients. The FSMB, together with the Accreditation Council for Graduate Medical Education (ACGME), and Intealth, established an advisory commission to evaluate the various approaches and develop meaningful recommendations for states in implementing these additional pathways. Accordingly, the Advisory Commission on Additional Licensure Models (ACALM) released guidance in 2025 addressing both [eligibility requirements](#) and the [transition from provisional to full licensure](#) with the intent of the legislation to expand patient access to care without compromising patient safety.

While SB 380 and HB 598 largely align with ACALM's recommendations, we respectfully offer several amendments to strengthen the legislation:

- Referring to the credential as a "limited license" better communicates to the public its supervised, scope-limited nature and distinguishes it from a full, unrestricted license;
- Requiring the issuance of the limited license to be dependent upon an employment offer with an appropriate, clinical facility which has the capability to supervise and assess the physician during the limited licensure period ensures structured evaluation that is

necessary to protect patients. It should be noted that, to date, all enacted states have adopted this approach, ideally matching the physician with supervising, fully-licensed physicians in the same specialty to appropriately evaluate proficiency; and

- Adjusting examination timing to expand eligibility while preserving standards. Requiring passage of Steps 1 and 2 of the United States Medical Licensing Examination (USMLE) for entry into the pathway. A complete employer-based assessment and successful passage of USMLE Step 3 should be completed prior to determining eligibility for a full and unrestricted medical license.

Thank you for your thoughtful consideration of these suggestions to amend SB 380 and HB 598 to address physician workforce needs on behalf of Marylanders and their access to quality and safe medical care. The appropriate sharing of oversight responsibilities between the Board of Physicians and employing health care entities will ensure the successful implementation of the subject legislation.

Sincerely,



Lisa A. Robin
Chief Advocacy Officer

About FSMB

FSMB is a national non-profit organization representing the medical boards within the United States and its territories that license and discipline allopathic and osteopathic physicians and, in some jurisdictions, other health care professionals. FSMB serves as the voice for state medical boards, supporting them through education, assessment, research, and advocacy while providing services and initiatives that promote patient safety, quality health care and regulatory best practices. FSMB serves the public through Docinfo.org, a free physician search tool that provides background information on the more than 1 million doctors in the United States.

cc: Senator Karen Lewis Young
Delegate Terri L. Hill