



Board of Physicians

Wes Moore, Governor · Aruna Miller, Lt. Governor · Harbhajan Ajrawat, M.D., Chair

2026 SESSION POSITION PAPER

BILL NO.: House Bill 771
TITLE: Health Occupations - Human Trafficking Awareness Training
COMMITTEE: Finance
POSITION: Letter of Information

POSITION AND RATIONALE

The Maryland Board of Physicians (the Board) submits this Letter of Information regarding House Bill (HB) 771, Health Occupations - Human Trafficking Awareness Training. The bill mandates that each health occupations board allow an applicant to receive continuing education credits for completing a specified human trafficking awareness training program. The bill also mandates that each health occupations board adopt regulations and conduct outreach related to continuing education credits for such programs. While the Board recognizes that human trafficking is a serious public health and safety issue, the proposed legislation presents significant operational challenges and raises broader concerns regarding the effectiveness of mandated continuing education requirements.

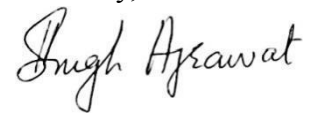
Operationally, the timelines for submitting training approvals and the Board completing regulations are functionally unattainable. The bill's enactment date of June 1, 2026, and the requirement that the Maryland Department of Health approve training by July 1, 2026, leave only one month for program approval. Furthermore, the amended timeline for drafting and submitting regulations by the health occupations boards has only increased minimally. The mandate for the Board to adopt regulations by January 1, 2027, remains difficult to meet given the standard administrative promulgation process, which typically requires six to twelve months from drafting to submission and overview by the Office of Regulation and Policy Coordination, as well as other key leaders in the regulations review process.

Furthermore, the Board continues to seek clarification on the bill's outreach requirements. While the legislation mentions website postings, the broader term "outreach" is undefined and could imply an expectation of significant marketing or educational advertisements that fall outside the Board's primary mission. The Board urges the Committee to consider the impact of continuing education requirements and the professional autonomy of Maryland's healthcare providers.

Utilizing existing renewal requirements for continuing education will allow practitioners to select education most relevant to their specific field of medicine or specialty, rather than emphasizing training that may not be applicable to the field or individual.

Thank you for your consideration. For more information, please contact Oriell Harris, Health Policy Analyst, at the Maryland Board of Physicians, at OriellT.Harris@maryland.gov.

Sincerely,

A handwritten signature in black ink that reads "Harbhajan Ajrawat". The signature is written in a cursive style with a large initial 'H'.

Harbhajan Ajrawat, M.D.
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.