

March 9, 2026

The Honorable Heather Bagnall, Chair
House Health and Government Operations Committee
241 Taylor House Office Building
Annapolis, Maryland 21401

Re: Testimony in Opposition to House Bill 1372 – “Public Health – Office of Health Care Quality Information and Maryland Department of Health Centralization Commission”

Dear Chair Bagnall and Members of the Committee:

The Maryland Optometric Association (MOA) is a 501(c)(6) nonprofit professional association representing hundreds of optometrists practicing in nearly every jurisdiction across the State of Maryland. MOA works to protect and advance the profession of optometry while ensuring that Maryland patients continue to receive safe, high-quality eye care. For these reasons, we have significant concerns regarding House Bill 1372.

Our primary concern relates to the proposed consolidation of all Health Occupations Boards under a centralized Health Care Centralization Commission. Health professions differ significantly in their regulatory structures, scope of practice, education and licensure requirements, and continuing education systems. Addressing important regulatory issues—such as licensure standards, scope of practice, education requirements, and fee structures—requires both historical knowledge and a detailed understanding of the unique characteristics of each profession.

The current system of independent boards allows for thoughtful, profession-specific deliberation and policymaking. These boards include licensed practitioners alongside patient advocates, ensuring both subject-matter expertise and appropriate public representation. This structure has long supported responsible governance and effective oversight of Maryland’s health professions.

Consolidating all Health Occupations Boards under a single centralized body risks diminishing profession-specific representation and undermining the autonomy that allows each board to regulate effectively. Additionally, because each board currently operates under different licensing and continuing education systems, the creation of a single centralized licensing structure raises serious concerns about administrative disruption and potential licensure delays. Such delays could further strain Maryland’s health care workforce at a time when we are already facing shortages.

The State Board of Examiners in Optometry has served Maryland for more than 100 years. The Board is self-funded and has consistently fulfilled its regulatory responsibilities effectively, ensuring both professional accountability and patient protection. We are not aware of any demonstrated need for structural changes of the magnitude proposed in HB 1372.

For these reasons, the Maryland Optometric Association respectfully requests an **unfavorable report** on House Bill 1372.

Thank you for your time and consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Cohen". The signature is written in a cursive style with a large, sweeping initial "J".

Jennifer Cohen, Executive Director
Maryland Optometric Association