



Board of Physicians

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

2026 SESSION POSITION PAPER

BILL NO.: SB 489
TITLE: Health Occupations - Physicians Trained in Foreign Countries - Exemption From Educational Requirements and Limited License
COMMITTEE: Health
POSITION: Letter of Support With Amendments

BACKGROUND:

During the 2024 interim, the Board conducted the Workgroup to Study Licensure of Foreign Trained Physicians (FTPs), also known as Internationally Trained Physicians (ITPs) and International Medical Graduates (IMGs) in Maryland (the Workgroup). Simultaneously, the Federation of State Medical Boards (FSMB), InTealth, and the Accreditation Council for Graduate Medical Education (ACGME) established the Advisory Commission on Additional Licensing Models (the Commission) to develop new or modified licensure pathways for foreign-trained physicians. The Commission's first recommendations addressed eligibility standards to ensure readiness for safe U.S. practice, while the second focused on assessment and supervision of foreign-trained physicians practicing in the United States.

The Workgroup examined challenges faced by IMGs and FTPs, licensure models in other states, data from the Federation of State Medical Boards, and the two sets of recommendations from the Commission. Based on this research, the Workgroup developed recommendations regarding applicant qualifications, application requirements, and the implementation of future legislation. A copy of the Workgroup's final report has been attached to this written testimony for reference.

POSITION AND RATIONALE

The Maryland Board of Physicians (the Board) submits this Letter of Support with Amendments for Senate Bill (SB) 489: Health Occupations - Physicians Trained in Foreign Countries - Exemption From Educational Requirements and Limited License. The Board has worked closely with the bill sponsor, proponents, and stakeholders to develop recommendations for a new licensure pathway for foreign-trained physicians that meaningfully addresses Maryland's healthcare workforce shortages while preserving patient safety and licensure integrity.

The Board supports SB 489 because it strengthens the physician workforce by mobilizing an underutilized population of trained physicians. However, the Board proposes the attached amendments to clarify the equivalency of qualifications with U.S.-trained physicians and international medical graduates. Additionally, the Board proposes adopting a pathway to full licensure for these applicants upon successful completion of their limited license term

Clarification of ECFMG:

As currently proposed, SB 489 does not clearly require that a qualified applicant both graduate with an international Doctor of Medicine degree and hold a current certification issued by the Educational Commission for Foreign Medical Graduates (ECFMG). The bill states that an applicant must graduate from an international medical program with accreditation status recognized by the ECFMG, which creates ambiguity as to whether individual certification is also required.

The Board believes clarification is necessary to ensure that all applicants meet the intended standard: possession of both a Doctor of Medicine degree from an international school of medicine and a current ECFMG certification. Explicitly establishing these qualifications ensures that each applicant's educational background and credentials are properly verified, consistent with existing standards for international medical graduates.

The Board proposes that on Page 5, strike on Lines 9 through 12 and replace with:

(2) HAVE RECEIVED AND HOLD:

(I) A DEGREE OF DOCTOR OF MEDICINE OR ITS EQUIVALENT FROM A MEDICAL SCHOOL LOCATED OUTSIDE THE UNITED STATES; AND

(II) A CURRENT CERTIFICATION ISSUED BY THE EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL GRADUATES;

Pathway to Full Licensure:

The Board proposes that SB 489 incorporate its amendments to establish a clear pathway to full licensure for foreign-trained physicians upon successful completion of the limited license term. Efforts to address the issue of foreign-trained physicians have consistently focused on strengthening and sustaining the healthcare workforce. To effectively attract and retain qualified physicians in Maryland, and to ensure continued care for Maryland patients, it is essential that the legislation include a pathway to full, unrestricted licensure. Absent such a pathway, the State risks limiting the initiative's long-term impact and missing a critical opportunity to build a stable, enduring physician workforce.

The Board proposes to add on Page 7 after line 8:

(J) TO BE ELIGIBLE TO APPLY FOR A FULL MEDICAL LICENSE TO PRACTICE MEDICINE IN MARYLAND, AN INTERNATIONALLY-TRAINED PHYSICIAN SHALL PROVIDE THE BOARD WITH PROOF OF THE FOLLOWING:

(1) SUCCESSFUL COMPLETION OF THE PARTICIPATING HEALTHCARE FACILITY'S EVALUATION, WITH AN ATTESTATION FROM THE FACILITY'S CHIEF MEDICAL OFFICER, OR A PHYSICIAN IN AN EQUIVALENT POSITION, THAT THE INTERNATIONALLY TRAINED PHYSICIAN IS COMPETENT TO PRACTICE INDEPENDENTLY; AND

(2) ACHIEVEMENT OF A PASSING SCORE ON STEP 3 OF THE UNITED STATES MEDICAL LICENSING EXAMINATION.

(K) INTERNATIONALLY TRAINED PHYSICIANS MAY OBTAIN EMPLOYMENT OUTSIDE OF THE PARTICIPATING HEALTHCARE FACILITY AFTER RECEIVING FULL LICENSURE.

Conclusion

The Board appreciates Senator Lam's leadership, engagement, and ongoing collaboration on this issue. His commitment to strengthening Maryland's physician workforce has helped facilitate meaningful dialogue among stakeholders. The amendment has been widely circulated and reflects input from multiple perspectives with the shared goal of creating a safe and accessible pathway.

For these reasons, the Board of Physicians urges a favorable report with amendments on Senate Bill (SB) 489: Health Occupations - Physicians Trained in International Medical Schools.

Thank you for your consideration. For more information, please contact Michael Tran (Michael.Tran@Maryland.Gov)

Sincerely,

A handwritten signature in cursive script that reads "Harbhajan Ajrawat". The signature is written in black ink and is positioned below the word "Sincerely,".

Harbhajan Ajrawat, M.D.
Chair, Maryland Board of Physicians