



March 30, 2026

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

Re: MD Senate Bill 489,
Health Occupations - Physicians Trained in International Medical Schools

Dear Chair Bagnall,

On behalf of the Federation of State Medical Boards (FSMB), thank you for the opportunity to comment on Senate Bill 489, which FSMB supports with the amendments proposed by the Maryland Board of Physicians.

FSMB was pleased to partner with the Accreditation Council for Graduate Medical Education (ACGME) and Intealth – which oversees Educational Commission for Foreign Medical Graduates (ECFMG) certification – over the last two years to develop thoughtful guidance for the consideration of states and territories of processes and means by which internationally-trained physicians (also sometimes described as fully-trained physicians) may enter into a period of provisional or limited licensure under supervision as part of a pathway to full and unrestricted licensure without requiring U.S.-based training in an ACGME-accredited residency training program.

FSMB strongly believes that the adoption of such a licensure pathway, as has been done in 20 other U.S. jurisdictions, should have sufficient screening procedures and safeguards in place to protect the public, the primary mission of state medical and osteopathic licensing boards. The lack of a full pathway in the current bill may lead to fewer applicants. The amendments submitted by the Board of Physicians include a pathway to full licensure that creates a statutory framework and includes the necessary safeguards to protect the citizens of Maryland.

Traditionally, International Medical Graduates (IMGs) have been required to obtain ECFMG Certification, a qualification that includes verification of their graduation from a World Directory-recognized medical school, passage of USMLE Steps 1 and 2, and demonstration of English language proficiency via the Occupational English Test (OET) Medicine. SB 489 should be clarified to ensure that each applicant's educational background and credentials are properly verified, consistent with existing standards for IMGs.

Additionally, all state medical boards require IMGs that seek licensure in the U.S. to pass the United States Medical Licensing Exam (USMLE) Step 3 prior to full medical licensure. SB 489 should be amended to include requiring passage of USMLE Step 3 to ensure applicants' qualifications are consistent with existing standards for IMGs.

For these reasons, we respectfully support SB 489, with the Board of Physicians' amendments that include (1) a requirement for current ECFMG Certification, and (2) Create a pathway to full licensure that requires passage of USMLE Step 3, and an attestation from a Chief Medical Officer, or comparable position, from a healthcare entity.

Sincerely,

A handwritten signature in black ink that reads "Lisa Robin". The signature is written in a cursive, flowing style.

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.