



## DEPARTMENT OF HEALTH

Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Dennis R. Schrader, Acting Secretary

### Board of Podiatric Medical Examiners

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### 2021 SESSION POSITION PAPER

**BILL NO.:** SB 952 – Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat  
**COMMITTEE:** Education, Health, and Environmental Affairs  
**POSITION:** Letter of Opposition

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**TITLE:** Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat

**BILL ANALYSIS:** Requires health occupations boards to waive internship or residency training requirements for licensure, certification, or registration for a former service member who is disabled as a result of combat deployment.

### **POSITION & RATIONALE:**

The Maryland Board of Podiatric Medical Examiners (the “Board”) is respectfully submitting this letter of opposition for Senate Bill 952 – Health Occupations – Internship and Residency Training Requirements – Waiver for Former Service Members Injured in Combat. SB 952 would require the Board to waive residency requirements for service members who were disabled as a result of an injury from combat deployment. While the Board supports efforts to ease the licensure process for service members, residency is an essential component of licensure and cannot be waived without jeopardizing patient safety.

The School of Podiatric Medicine provides a foundation and framework for the practice of podiatric medicine and surgery. However, it is the residency training where podiatrists are rotating through medical and surgical specialties, typically in a hospital or ambulatory surgical facility, to fully train and learn to perform the responsibilities and duties of their profession. The Council of Podiatric Medical Education requires a three year post graduate advanced podiatric

medicine and surgery education, which is achieved through an approved Podiatric Residency Program. The training in an approved residency program “further assures state podiatric medicine and surgery boards and the public of the competence of newly licensed doctors of podiatric medicine (DPM)”. Waiving residency requirements would remove an essential safeguard to the health and wellbeing of the citizens of Maryland. The Board is concerned that by removing or waiving the residency requirements, it would be mandated to issue the same license to a podiatrist that met all the training requirements during residency for obtaining experience and equivalency in practicing standards of care, as well as issue the same license to a podiatrist that has not achieved the training, clinical education, experience and expertise, because they lacked the residency training.

The Board is not aware of any instances where licensure was denied because a service member was unable to fulfill the residency components of their education due to a disability as a result of injury from combat deployment. The Health Occupation Boards can follow the Americans with Disabilities Act of 1990, and according to federal guidance, make reasonable accommodations for former service members injured in combat.

The Board supports efforts to ensure that the licensure process is fair and accessible for all who meet requirements, and would be happy to work with bill sponsors and advocates on finding a non-legislative solution to any access barriers. However, in its current state, the Board must respectfully oppose SB 952.

For more information, please contact Eva Schwartz, Executive Director, Maryland Board of Podiatric Medical Examiners at [eva.schwartz@maryland.gov](mailto:eva.schwartz@maryland.gov).

*The opinion of the Board expressed in this document does not necessarily reflect that of the Maryland Department of Health or the Administration.*