



Physicians Caring for Texans

House Committee on Public Health
Oral Testimony by Ezequiel “Zeke” Silva III, MD, Texas Medical Association
Senate Bill 2207 by Sen. Bob Hall
May 12, 2025

Good evening, my name is Dr. Zeke Silva, and I am an interventional radiologist from San Antonio. Additionally, I chair the Texas Medical Association’s (TMA’s) Council on Legislation, the body that determines legislative positions for the association. On behalf of TMA and its more than 59,000 members, we thank Chair Van Deaver, Vice Chair Campos, and the members of the House Public Health Committee for the opportunity to provide testimony **against** Senate Bill 2207.

The current Texas Medical Board (TMB) rule has been in place for 24 years, and TMA adopted comparable policy 25 years ago. TMB’s development of this rule was carefully negotiated by TMA and representatives of several state medical specialty societies to improve communication through public advertising.

Prior to the adoption of this TMB rule in 2001, it was reported that there was advertising on billboards about board certification of staff physicians in certain medical specialties without the additional notation to inform the public that not all certifying boards had the same requirements. Excluding that notation likely gave the public the impression that the standards were consistent for all the physicians advertised as board certified, though that is not the case. The rule sought to define a standard for advertising board certification to the public.

The largest national multi-specialty board certification organizations, by far, are the American Board of Medical Specialties (ABMS) and the American Osteopathic Association Bureau of Osteopathic Specialists (AOABOS). These certifying boards set a high bar for certification and these standards were incorporated into the TMB rule which requires recognized certifying boards to meet certain requirements (i.e., they must have at least 100 certified physicians, they must require passage of an exam that has been psychometrically evaluated for validation in the physician’s medical specialty to ensure an appropriate peer-review process, and they must require their members to have completed graduate medical education in an accredited program with training in the physician’s specialty or subspecialty and be tax-exempt and have a permanent headquarters and staff).

Certification boards that meet these standards and have requirements that are substantially equivalent to the ABMS and the AOABOS can apply to TMB for recognition as such. Currently 12 medical specialty boards have obtained this recognition.

SB 2207 would remove the TMB rule and the role of TMB in approving applications from additional certifying organizations. TMA has serious concerns that this change will remove important information for patients about a physician’s qualifications.

Board certification status is commonly used by patients and parents in selecting physicians for themselves and their families. Under current TMB rules, when a prospective patient sees a physician advertising board certification, that patient can take comfort that a reputable certifying body has evaluated a physician's training and competence in the advertised specialty.

Removing the current standard and TMB from approving additional organizations (and from re-evaluating their approval every five years from the date of initial approval) will remove Texas patients' confidence that the advertisement of "board certification" reflects a determination by a reputable certifying organization and that there was consistency in the standards used by the recognized boards.

The financial obligations for TMB's approval process are not onerous. The initial application fee is \$200. This is paid by the certifying organization, not the physicians. Then every five years the organization must submit a \$200 renewal fee. If there is concern that these costs are too high or if there are other concerns with the application process, then it would be better to fix these issues rather than throwing out the process altogether.

We would welcome the opportunity to work with bill author Senator Hall on addressing these concerns. Thank you very much for the opportunity to comment. Should you have any questions, please do not hesitate to contact Michelle Romero, TMA associate vice president of Public Affairs, by email at michelle.romero@texmed.org.