



# Board of Nursing

Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Robert R. Neall,  
Secretary

February 13, 2020

The Honorable Paul G. Pinsky  
Chair, Senate Education, Health, and Environmental Affairs Committee  
2 West, Miller Senate Office Building  
Annapolis, MD 21401-1991

**RE: SB0545 - Pharmacists - Administration of Self-Administered Medications and  
Maintenance Injectable Medications - Letter of Opposition**

Dear Chair Pinsky:

The Maryland Board of Nursing (“the Board”) respectfully submits this letter of opposition for SB0545 - Pharmacists - Administration of Self-Administered Medications and Maintenance Injectable Medications. This bill would allow a pharmacist who meets the requirements of certain regulations to administer a maintenance injectable medication to a patient under certain circumstances; and requires the State Board of Pharmacy, on or before September 1, 2021, and in consultation with the State Board of Physicians and the State Board of Nursing, to adopt certain regulations for pharmacists requiring pharmacists to complete certain training program in order to administer a maintenance injectable medication.

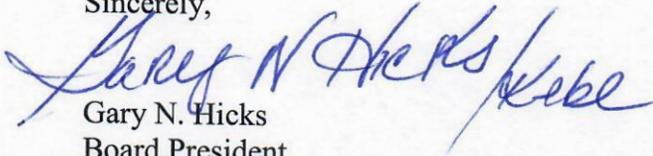
The Board is concerned that maintenance injectable medications are not specifically defined in the bill. “Maintenance injectable medications” include various high risk medications requiring on-going monitoring such as psychotropic, insulin and anticoagulants. This raises serious patient safety concerns. Additionally, communication issues between the pharmacist and practitioner could potentially leave the practitioner out of the equation in regards to care management. Complications in patient care could arise when responsibility for overall management of the patient becomes unclear.

The requirement that the regulations “shall” waive the requirement to complete a training program for a pharmacist who already has undergone the training as part of the pharmacist’s formal educational program does not allow for a time restriction or required training updates. A pharmacist could potentially go several years without receiving updated training related to administration of the medication as long as the training was completed in the formal educational program. This too poses serious safety concerns for the patient.

For the reasons discussed above, the Board of Nursing respectfully submits this letter of opposition to SB0545.

For more information, please contact Rhonda Scott, Deputy Director, at (410) – 585 – 1953 ([rhonda.scott2@maryland.gov](mailto:rhonda.scott2@maryland.gov)) or Karen E. B. Evans, Executive Director, at (410) – 585 – 1914 ([karene.evans@maryland.gov](mailto:karene.evans@maryland.gov)).

Sincerely,

A handwritten signature in blue ink that reads "Gary N. Hicks". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Gary N. Hicks  
Board President

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