



Board of Nursing

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

January 20, 2021

The Honorable Shane E. Pendergrass
Chair, House Health and Government Operations Committee
Room 241, House Office Building
Annapolis, MD 21401-1991

RE: HB0135 - Pharmacists - Administration of Self-Administered Medications and Maintenance Injectable Medications - Letter of Opposition

Dear Chair Pendergrass:

The Maryland Board of Nursing (“the Board”) respectfully submits this letter of opposition for HB0135 - 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; requiring the State Board of Pharmacy, on or before September 1, 2022, 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 programs in order to administer a maintenance injectable medication.

The Board is concerned that maintenance injectable medications as defined in the bill may include various high-risk medications requiring on-going monitoring such as psychotropics, insulin, and anticoagulants. This raises serious patient safety concerns. Additionally, administration of these medications often requires pre and post assessment of the patient’s medical condition. This raises additional concerns regarding the pharmacist’s scope of practice and training in conducting health assessments.

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 HB0135.

For more information, please contact Iman Farid, Health Policy Analyst, at (410) 585 - 1536 (iman.farid@maryland.gov) or Rhonda Scott, Deputy Director, at (410) 585 – 1953 (rhonda.scott2@maryland.gov)

Sincerely,

A handwritten signature in black ink, appearing to read "G. Hicks", with a long horizontal flourish extending to the left.

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.