



January 27, 2022

The Honorable Shane E. Pendergrass  
Chairwoman  
Maryland State House Health & Government Operations Committee  
6 Bladen Street  
Annapolis, Maryland 21401

Dear Chairwoman Pendergrass:

**The American Osteopathic Association (AOA), the Maryland Association of Osteopathic Physicians (MAOP) and the American Osteopathic College of Anesthesiologists (AOCA) write to strongly encourage you to oppose HB 55.** This bill expands the authority of nurse anesthetists by allowing them to prescribe drugs – including controlled substances – without physician involvement, under certain circumstances. We are concerned that such a large increase in scope of practice, without commensurate increases in education, training or competency demonstration requirements, could place the health and safety of Maryland patients at risk.

The AOA proudly represents its professional family of more than 168,000 osteopathic physicians (DOs) and medical students (OMS) nationwide. The AOA promotes public health, encourages scientific research, serves as the primary certifying body for DOs and is the accrediting agency for osteopathic medical schools. More information on DOs and osteopathic medicine can be found at [www.osteopathic.org](http://www.osteopathic.org). The MAOP is a professional medical organization that represents over 1,100 DOs providing patient care in Maryland. The AOCA is a medical specialty society that represents approximately 1,200 osteopathic anesthesiologists nationwide.

Our organizations support a “team” approach to medical care because the physician-led medical model ensures that professionals with complete medical education and training are adequately involved in patient care.

**Osteopathic (DO) and allopathic (MD) medical education includes:**

- Four years of medical school, which includes two years of didactic study totaling upwards of 750 lecture/practice learning hours just within the first two years, plus two more years of clinical rotations done in community hospitals, major medical centers and doctors’ offices.
- 12,000 to 16,000 hours of supervised postgraduate medical education (“residencies”) completed over the course of three to seven years, during which DOs develop advanced knowledge and clinical skills relating to a wide variety of patient conditions over the course of three to six years.

- Physicians also complete a comprehensive, three-part licensing examination series designed to test their knowledge and ability to safely deliver care to patients before they are granted a license to independently provide care to patients.

**Nurse anesthetists complete:**

- A **two-year master's degree** in a nurse anesthesia program.
- **No postgraduate training.**

**This bill allows nurse anesthetists to independently:**

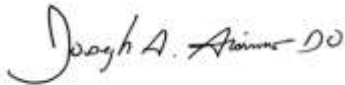
- **Prescribe drugs – including controlled substances – to existing patients for a period of up to ten days, without any physician involvement.**

The AOA, the MAOP and the AOCA recognize the need to strengthen the health care workforce in Maryland and the importance of ensuring patient access to important services such as anesthesia. We would welcome the opportunity to work with leadership in the state to identify policy solutions that address these concerns while ensuring that patients in Maryland receive high-quality and safe health care services, including anesthesia.

**Our organizations urge you to protect the safety of Maryland patients by opposing HB 55.**

Should you need any additional information, please feel free to contact Raine Richards, JD, Senior Director, State Government Affairs at [rrichards@osteopathic.org](mailto:rrichards@osteopathic.org) or (800) 621-1773, ext. 8199.

Sincerely,



Joseph A. Giaimo, DO  
President, AOA



Kevin Klauer, DO, EJD  
CEO, AOA



Christina A. Steele, DO, MPH  
President, MAOP



David Ninan, DO  
President, AOCA

CC: Ernest R. Gelb, DO, President-elect, AOA  
Richard R. Thacker, DO, Chair, Department of Governmental Affairs, AOA  
Joel A. Kase, DO, Chair, Council on State Health Affairs, AOA  
David Pugach, JD, Senior Vice President, Department of Public Policy, AOA  
Raine Richards, JD, Senior Director, State Government Affairs, AOA  
Stephanie Henley, Executive Director, MAOP  
Julie Kahlfeldt, Executive Director, AOCA