

February 8, 2022

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

Re: Oppose SB 513: Health Occupations – Clinical Nurse Specialists – Prescribing Authority

Dear Chairman Pinsky and Honorable Members of the Committee:

As a licensed and practicing physician in Maryland, I am writing to urge you to **OPPOSE** Senate Bill 513: Health Occupations – Clinical Nurse Specialists - Prescribing Authority (SB 513), which would authorize clinical nurse specialists (CNSs) to prescribe controlled substances without physician involvement or oversight.

If passed, this legislation would unnecessarily put Marylanders' health and safety at risk. While CNSs play an important role on some medical teams, their training programs are not designed to prepare them for the specific role of diagnosing and treating patients. CNS training programs are designed to teach CNSs broad theory of how to manage healthcare teams, how to apply research to practice, how to apply statistics to nursing practice, etc. Their instruction on diagnosing and prescribing may be limited to a few classes and shadowing other providers. Unfortunately, this level of training is inadequate to safely make medical diagnoses, understand drug-drug interactions, understand how a medication may affect other organ systems, and appreciate uncommon side effects which can be fatal.

I have spoken with medical professionals who work with CNSs, and they were all in agreement that CNSs do not have appropriate expertise to prescribe medications and analyze laboratory data. CNSs may have an important role on some teams, but it is not in the capacity to prescribe medications.

Furthermore, HB 276 does not provide limits on the type of medications a CNS could prescribe. In Maryland, the opioid epidemic has been exacerbated by the epidemic, and we must ensure that these kinds of medications are not overprescribed.

Please do not equate making healthcare more accessible with making healthcare safe. Safety must be a priority for all Maryland residents.

For these reasons, I urge an unfavorable report of SB 513.

Respectfully Submitted,



Sanaz Kumar, MD
Board-Certified Adult, Child and Forensic Psychiatrist