



Board of Pharmacy

Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Acting Secretary

*Jennifer L. Hardesty, Board President – Deena Speights-Napata, Executive Director
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January 31, 2023

The Honorable Melony Griffith
Chair, Finance Committee
3 East, Miller Senate Office Building
Annapolis, MD 21401-1991

RE: Senate Bill 78 – Health Occupations – Service Members, Veterans, and Military Spouses – Temporary Licensure, Certification, Registration, and Permitting - Letter of Information

Dear Chair Griffith and Committee Members:

The Maryland Board of Pharmacy (the Board) respectfully submits this letter of information for Senate Bill (SB) 78 – Health Occupations – Service Members, Veterans, and Military Spouses – Temporary Licensure, Certification, Registration, and Permitting.

SB 78 would require the Board to issue an “expedited temporary license, certificate, registration, or permit” to a qualified “service member, veteran, or military spouse....” § 1-702.1(A)(1). The “expedited temporary license, certificate, registration, or permit” would be valid until (1) six months after the date of issuance or (2) the date on which a full license is issued, whichever is earlier. § 1-702.1(A)(2). SB 78 would require, among other items, the Board to determine whether an applicant’s “license, certificate, registration, or permit...required substantially similar qualifications....” § 1-702.1(A)(3)(II)(3). SB 78 would require, among other items, the Board to verify that an “applicant has completed a national criminal history records check in accordance with regulations adopted by the Board. § 1-702.1(A)(3)(V). SB 78 would require, among other items, the Board to verify that an “applicant has submitted an application for full licensure, certification, registration, or permitting.” § 1-702.1(A)(3)(VI). SB 78 would authorize the Board to set an application fee for the “expedited temporary license, certificate, registration, or permit.” § 1-702.1(A)(3)(VII). SB 78 would require the Board to develop a procedure by which an applicant can “prominently” notify the Board of their affiliation with the military. § 1-704(a)(1) – (2). SB 78 would require the Board to collect and report information regarding applications received, processed, not processed, and delayed to the General Assembly starting in 2025. § 1-704(e).

SB 78 would require the Board to create a new class of expedited temporary licenses, registrations, and permits. Additionally, the Board would be required to develop and implement a new monitoring system to track temporary licenses, registrations, and permits that expire six months post issuance or the date on which a full license is issued, whichever is earlier. The Board’s current processing time for completed full applications is 48 hours. Should SB 78 become law, the Board would be required to verify that an “applicant has submitted an application for full licensure, certification, registration, or permitting” as part of the temporary

expedited application process. Accepting both applications would increase the number of forms the Board's licensing specialists process. Additionally, the Board would be required to determine whether an applicant's "license, certificate, registration, or permit...required substantially similar qualifications..." To implement this provision, a member of the licensing staff would be required to compare and evaluate whether the qualifications that supported an applicant's valid license, registration, or permit are substantially similar to the qualifications required to obtain a full license, registration, or permit from the Board. This analysis may require substantial communication with an applicant and correspondence with other licensing entities, which may lead to processing delays. Issuing temporary licenses, registrations, and permits may increase processing time for full licenses, registrations, and permits.

The Veterans Full Employment Act of 2013 requires all health occupations boards to expedite the licensing and registration process for active-duty service members, veterans, and military spouses. *See* Md. Code Ann., Health Occ. §§ 1-701 – 706. The Board is in full compliance with the Veterans Full Employment Act of 2013 and has posted an informational notice on its website regarding the law. The Board provides application assistance to covered persons who submit a request.

The Board supports full employment of veterans, military spouses, and service members; however, creating a new class of expedited temporary permits would create administrative burdens for the Board without providing substantial benefits to covered persons.

If you would like to discuss this further, please do not hesitate to contact Deena Speights-Napata, MA, Executive Director at deena.speights-napata@maryland.gov or (410) 764-4753.

Sincerely,



Deena Speights-Napata, MA
Executive Director