

MARYLAND PSYCHIATRIC SOCIETY



January 28, 2025

OFFICERS 2024-2025

Theodora G. Balis, M.D.
President

Ronald F. Means, M.D.
President-Elect

Tyler Hightower, M.D.
Secretary-Treasurer

Carol Vidal, M.D., Ph.D.
Council Chair

EXECUTIVE DIRECTOR

Meagan H. Floyd

COUNCIL

Benedicto R. Borja, M.D.
Kim L. Bright, M.D.
Mary Cutler, M.D.
Mark S. Komrad, M.D.
Cynthia Major Lewis, M.D.
Rachna S. Raisinghani, M.D.
Traci J. Speed, M.D., Ph.D.
Michael A. Young, M.D., M.S.

EARLY CAREER PSYCHIATRIST COUNCILOR

Jamie D. Spitzer, M.D.

RESIDENT-FELLOW MEMBER COUNCILOR

Hannah Paulding, M.D.

PAST PRESIDENTS

Virginia L. Ashley, M.D.
Jessica V. Merkel-Keller, M.D.

APA ASSEMBLY REPRESENTATIVES

Annette L. Hanson, M.D.
Elias K. Shaya, M.D.
Brian Zimnitzky, M.D.

MEDCHI DELEGATE

Enrique I. Oviedo, M.D.

APA AREA 3 TRUSTEE

Geetha Jayaram, M.D.

The Honorable Joseline A. Pena-Melnyk
Chair, Health Government Operations Committee
241 Taylor House Office Building
Annapolis, Maryland 21401

RE: Oppose – HB 867: State Board of Physicians - Naturopathic Doctors - Prescriptive Authority and Administration of Medication

Dear Chairwoman Pena-Melnyk and Honorable Members of the Committee:

The Maryland Psychiatric Society (MPS) and the Washington Psychiatric Society (WPS) are state medical organizations whose physician members specialize in diagnosing, treating, and preventing mental illnesses, including substance use disorders. Formed more than sixty-five years ago to support the needs of psychiatrists and their patients, both organizations work to ensure available, accessible, and comprehensive quality mental health resources for all Maryland citizens; and strive through public education to dispel the stigma and discrimination of those suffering from a mental illness. As the district branches of the American Psychiatric Association covering the state of Maryland, MPS and WPS represent over 1100 psychiatrists and physicians currently in psychiatric training.

The Maryland Psychiatric Society (MPS) strongly opposes House Bill 867, which would significantly expand the prescribing and drug administration authority of naturopathic doctors to include Schedule III, IV, and V controlled substances. This bill presents a clear risk to public health and safety by allowing individuals without adequate medical training to prescribe and administer powerful and potentially addictive medications.

Controlled substances in Schedules III-V include drugs with well-documented risks, including abuse potential, dependence, and significant psychiatric side effects. These include ketamine (Schedule III), a dissociative anesthetic with hallucinogenic properties that has gained popularity in unregulated wellness clinics; benzodiazepines such as Xanax and Valium (Schedule IV), which carry a high risk of dependence and overdose; and codeine-containing cough syrups (Schedule V), which are frequently misused. By granting prescribing privileges to naturopaths, this bill would create a proliferation of poorly regulated clinics administering these substances without the rigorous oversight and medical safeguards required to ensure patient safety.

Unlike medical doctors, psychiatrists, or even nurse practitioners, naturopaths do not receive the necessary pharmacological training to responsibly prescribe and monitor controlled substances. Their educational programs lack the extensive clinical training required to safely assess, diagnose, and treat patients with complex medical and psychiatric conditions. The absence of formal residency training further exacerbates concerns regarding their ability to appropriately manage medications with significant risks.

Maryland has already seen an influx of unregulated ketamine clinics operating with minimal oversight. By expanding naturopathic prescribing authority, HB 867 would open the door to even more such facilities, increasing the risk of inappropriate prescribing, misuse, and patient harm. Additionally, allowing naturopaths to administer these drugs by intravenous and subcutaneous injection—without the extensive medical training required for safe administration—further endangers patient safety.

At a time when Maryland is grappling with the opioid crisis, rising rates of benzodiazepine dependence, and increasing concerns about the commercialization of psychedelic treatments, it is irresponsible to lower prescribing standards and widen access to these substances outside of appropriately trained medical professionals. For these reasons, the Maryland Psychiatric Society urges an unfavorable report on HB 867.

For all the reasons above, MPS and WPS ask the committee for a favorable report on HB 735. If you have any questions regarding this testimony, please contact Lisa Harris Jones at lisa.jones@mdlobbyist.com.

Respectfully submitted,
The Maryland Psychiatric Society and the Washington Psychiatric Society
Legislative Action Committee