

SB 778/HB 1426: Clinical Research Pharmacies and Clinical Trials - Permits, Ownership, and Definition of Practice of Medicine: Please vote to **OPPOSE** this bill.

Dear Finance Committee and Health Committee:

I am writing to strongly urge you to **OPPOSE SB 778/HB 1426** during committee consideration or floor votes.

While supporting clinical research and innovation in Maryland is important, this legislation represents an unnecessary and risky expansion of pharmacy scope that could undermine physician-led patient care. The practice of medicine—including decisions about investigational treatments in clinical trials—should remain under the direct supervision of qualified physicians who can fully assess patient risks, eligibility, informed consent, and overall health needs. Allowing permitted research pharmacies (and potentially non-physician-owned entities) to handle dispensing and oversight without clear physician involvement risks fragmenting care, reducing accountability, and compromising patient safety in high-stakes experimental contexts.

Current laws already enable clinical trials through established protocols involving physicians, institutional review boards, and licensed pharmacies. Creating a special permit category and narrowing the definition of medical practice could open doors to less regulated operations, potentially prioritizing research efficiency over rigorous medical standards.

Maryland should protect the integrity of medical practice by maintaining physician oversight in all aspects of patient treatment, including investigational drugs—rather than carving out exceptions that dilute professional responsibility.

For these reasons, I respectfully ask you to **vote against SB 778/HB 1426**.

Thank you for your time and thoughtful consideration of this critical health care and patient safety matter.

Sincerely,

Trudy Tibbals