



# Board of Physicians

Wes Moore, Governor · Aruna Miller, Lt. Governor · Harbhajan Ajrawat, M.D., Chair

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**2026 SESSION  
POSITION PAPER**

**BILL NO.:** Senate Bill 778 - Clinical Research Pharmacies and Clinical Trials - Permits, Ownership, and Definition of Practice of Medicine  
**COMMITTEE:** Health  
**POSITION:** Letter of Information

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The Maryland Board of Physicians (the Board) is respectfully submitting this Letter of Information for Senate Bill (SB) 778 - Clinical Research Pharmacies and Clinical Trials - Permits, Ownership, and Definition of the Practice of Medicine. SB 778 establishes a clinical research pharmacy permit issued by the Board of Pharmacy and authorizes a health care provider to hold ownership interest in a clinical research pharmacy under certain circumstances. In addition, as amended, SB 778 clarifies that a license is not required to own or have ownership interest in a clinical research pharmacy, and that a health occupation board may investigate an allegation that an individual employed by a clinical research pharmacy is practicing without a license or other authorization, or is practicing in violation of a provision of the Health Occupations Article.

The Board had initial concerns that altering the definition of the practice of medicine would result in unintended consequences that would impact the Board's disciplinary authority and ability to adequately protect the public. After conversations with Senator Feldman and the proponents, it was understood that the intent of that alteration was to clarify that ownership or ownership interest of a clinical research pharmacy by itself was not considered the practice of medicine. The Board, the Senator, and the proponent worked collaboratively to amend SB 778 in a manner that maintains that intent without altering the definition of the practice of medicine.

The Board appreciates Senator Feldman's attention to the Board's concerns and willingness to work together on SB 778. As amended, the Board's initial concerns are resolved.

Thank you for your consideration. For more information, please contact Madeline DelGreco, Manager of Policy and Legislation, at the Maryland Board of Physicians, at 443-591-9082 or [Madeline.DelGreco@maryland.gov](mailto:Madeline.DelGreco@maryland.gov).

Sincerely,

Harbhajan Ajrawat, M.D.  
Chair, Maryland Board of Physicians

**The opinion of the Board expressed in this document does not necessarily reflect that of the Maryland Department of Health or the Administration.**